

**AFFIDAVIT**

I, Thomas Corbolotti, being sworn, state:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since 2020. I am currently assigned to the FBI’s Boston Field Office, where I am a member of a squad that investigates corporate and securities fraud, insider trading, money laundering, and other white-collar criminal offenses. I have received on-the-job training and participated in FBI training courses. My investigations and training have included the use of surveillance techniques and the execution of arrest warrants and search warrants for physical and digital evidence.

2. I am a “federal law enforcement officer” within the meaning of Fed. R. Crim. P. 41(a)(2)(C), that is, a government agent authorized to enforce criminal laws and duly authorized by the Attorney General to execute warrants issued under the authority of the United States.

3. I make this affidavit in support of an application for a criminal complaint charging ZHI “JOSH” GE (a/k/a GEZ) and EAMMA SAFI with: (i) conspiracy to commit securities fraud, in violation of Title 18, United States Code, Sections 371 and 1349; (ii) securities fraud, in violation of Title 15, United States Code, Sections 78j(b) and 78ff(a), Title 17, Code of Federal Regulations, Section 240.10b-5, and Title 18, United States Code, Sections 1348 and 2; (iii) conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h); and (iv) money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), (a)(2)(B)(i), and 2.

4. I have personally participated in this investigation, and the facts in this affidavit come from, among other things, my personal observations, my training and experience, publicly available information, information obtained from the United States Securities and Exchange

Commission (“SEC”) and the Financial Industry Regulatory Authority (“FINRA”),<sup>1</sup> information obtained from other witnesses and law enforcement agents, and materials obtained through legal process, Court orders, and Court-authorized search warrants. Unless otherwise noted, all times are set forth in Eastern Time and are approximate.

5. In submitting this affidavit, I have not included every fact known to me about this investigation. Rather, I have included only those facts that I believe are sufficient to establish probable cause for the criminal complaint charging GE and SAFI with the offenses set forth above.

### **FACTUAL BACKGROUND**

6. As set forth below, there is probable cause to believe that GE and SAFI, together with others known and unknown, engaged in an insider trading and money laundering scheme in which they: recruited investment bankers and other corporate insiders with access to material non-public information (“MNPI”) about the financial performance and merger-and-acquisition activity of publicly traded companies, who were willing to share that MNPI in violation of the fiduciary duties and/or duties of trust and confidence the conspirators owed to the sources of the information, or that the sources owed to the companies; obtained MNPI regarding the merger-and-acquisition activity and financial results of numerous companies; traded the stocks of those publicly traded companies while in possession of that MNPI; recruited other individuals into the scheme who agreed to trade in the securities of various companies while in possession of MNPI and to share the profits of that illicit trading; and took steps to conceal the scheme from regulators, law enforcement, and others, including laundering the illicit trading proceeds through financial transactions designed to conceal and disguise the nature, location, source, ownership, and control

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<sup>1</sup> FINRA is a private, not-for-profit corporation that acts as a self-regulatory organization for the brokerage industry. FINRA seeks to provide investor protection and ensure market integrity through regulation of broker-dealers.

of those trading proceeds, by communicating about the scheme in person, and by using disposable cell phones, coded language, and encrypted messaging applications.

**Relevant Individuals and Entities**

7. GE resided in Singapore.
8. SAFI resided in the United Arab Emirates and Germany.
9. Cooperating Witness 1 (“CW-1”) resided in, variously, Nevada and California in the United States, and in the Czech Republic.<sup>2</sup>
10. CC-1 resided in France and shared ownership with SAFI in a restaurant in Paris, France. CC-1 previously worked as an investment banker at Merrill Lynch in France, including as recently as 2014.
11. CC-2 resided in France and worked in the mergers and acquisitions department of two publicly traded companies, Atos S.E. and Worldline S.A. From in or about 2006 to in or about 2016, CC-2 worked as an investment banker at Merrill Lynch in France, overlapping with CC-1. CC-2 was an investor in the restaurant owned by SAFI and CC-1.
12. CC-3 resided in Hong Kong.
13. CC-4 resided in Singapore.
14. CC-5 resided in Singapore.
15. CC-6 resided in Malaysia.
16. CC-7 resided in Singapore.
17. CC-8 resided in Singapore.

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<sup>2</sup> CW-1 has pleaded guilty to conspiracy to commit securities fraud in connection with CW-1’s conduct as set forth herein and has entered into a cooperation agreement with the government. CW-1 is cooperating in the hope of obtaining leniency when CW-1 is sentenced. As set forth herein, the information CW-1 has provided has been corroborated by various sources of information, including documents, messages, and trading and other financial records.

18. CC-9 resided in Singapore.
19. CC-10 resided in Singapore.
20. CC-11 resided in Singapore.
21. Individual 1 resided in Florida and was a close relative of CW-1.
22. Individual 2 was CW-1's girlfriend and, for a period of time, his spouse, and resided in the Czech Republic.
23. Individual 3 was CW-1's friend and resided in California.
24. Individual 4 was a close relative of GE and resided in Singapore and Hong Kong.
25. Individual 5 resided in Thailand.
26. Individual 6 resided in New York.
27. Individual 7 resided in Hong Kong.
28. Individual 8 resided in Singapore.
29. The Advisory Board Company ("ABCO") was a research, technology, and consulting healthcare business that, at relevant times, traded on the New York Stock Exchange ("NYSE") under the ticker symbol ABCO.
30. Alexion Pharmaceuticals Inc. ("Alexion") was a biopharmaceutical company headquartered in Boston, Massachusetts, that, at relevant times, traded on the NASDAQ Stock Market ("NASDAQ") under the ticker symbol ALXN.
31. Atos S.E. ("Atos") was an information technology company headquartered in France with offices worldwide. At relevant times, Atos traded on the Paris Stock Exchange under

the ticker symbol ATO and its American depositary receipts (“ADRs”) traded on the over-the-counter market in the United States under the ticker symbol AEXAY.<sup>3</sup>

32. Gemalto N.V. (“Gemalto”) was an international digital security company that was based in Amsterdam, Netherlands. At relevant times, Gemalto traded on the Euronext N.V., under the ticker symbol GTOMY.

33. Kindred Healthcare, Inc. (“Kindred”) was a specialty hospital company that, at relevant times, traded on the NYSE under the ticker symbol KND.

34. Medidata Solutions (“Medidata”) was an American technology company that, at relevant times, traded on the NYSE under the ticker symbol MDSO.

35. Pinnacle Foods, Inc. (“Pinnacle”) was a packaged foods company that, at relevant times, traded on the NYSE under the ticker symbol PF.

36. Principia Biopharma Inc. (“Principia”) was a biopharmaceutical company that, at relevant times, traded on the NASDAQ under the ticker symbol PRNB.

37. Tiffany & Co. (“Tiffany”) was a jewelry retailer that, at relevant times, traded on the NYSE under the ticker symbol TIF.

38. Wright Medical Group, N.V. (“Wright Medical”) was a medical device company that, at relevant times, traded on the NYSE under the ticker symbol WMGI.

39. Walgreens Boots Alliance, Inc. (“Walgreens”) was a multinational holding company that owned the retail pharmacy chains Walgreens in the United States and Boots in the United Kingdom. At relevant times, Walgreens traded on the NYSE under the ticker symbol WBA.

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<sup>3</sup> ADRs are U.S. dollar-denominated certificates that trade on American stock exchanges and track the price of a foreign company’s domestic shares.

40. Alexion, Kindred, Medidata, Pinnacle, Principia, Tiffany, Wright Medical, and Walgreens were issuers that each had a class of securities registered under Section 12 of the Securities Exchange Act of 1934.

### **Overview**

41. Beginning no later than in or about November 2016 and continuing through at least in or about December 2020, GE and SAFI engaged in an insider trading and money laundering scheme that involved participants in the United States and multiple other countries. As part of the scheme, GE and SAFI conspired with CC-1, CW-1, and others to, among other things, obtain MNPI about the financial performance and merger-and-acquisition activity of various publicly traded companies, to trade in the securities of those companies while in possession of that MNPI, and to launder the proceeds of that illicit trading.

42. In interviews with investigators, CW-1 has admitted to participating in the insider trading and money laundering scheme with GE, SAFI, and others. According to CW-1, and as set forth in further detail below, GE recruited CW-1 to the scheme, including by providing him with MNPI on deals to sample or “watch” and by introducing CW-1 to SAFI and CC-1; instructed CW-1 that he would need to kickback 50 percent of his illicit trading proceeds to SAFI and others in order to receive MNPI as part of the scheme; provided CW-1 with MNPI on which to trade as part of the scheme; and directed CW-1 how and where to send illicit trading proceeds as kickbacks, among other actions.

### **November 2016: GE’s Recruitment to the Scheme by SAFI and CC-1**

43. In or about November 2016, SAFI and CC-1 recruited GE to the scheme, initially to act as a recruiter for additional traders. As set forth below, following a November 2016 meeting at the Paris restaurant co-owned by SAFI and CC-1, GE and SAFI engaged in coded

communications as part of the scheme about, among other things, using “socks and shoes” to communicate—code for disposable cell phones and SIM cards—“greens,” code for money, and “races,” code for forthcoming corporate announcements that were not yet public, as well as “running a race,” code for recruiting traders to participate in the scheme, trading on the basis of the MNPI, and kicking back illicit trading proceeds.

44. Specifically, on or about November 17, 2016, SAFI sent a Facebook message to GE: “Since [CC-1’s first name] wants to see you this Friday. Plan would be lunch and in the evening drinks.”<sup>4</sup> Later that day, while discussing GE’s travel arrangements to Paris, SAFI sent a message to GE, “Friday you will be welcomed to our world of business,” and later, “and then you can go directly to the restaurant.”

45. The following day, on or about November 18, 2016, after arriving in Paris, GE sent a message to SAFI: “When do I meet [CC-1’s first name] today. Can’t wait to get started.” SAFI responded: “So you will be 5:30 at the restaurant.” Several hours later, GE and SAFI exchanged the following messages, using the terms “socks” and “shoes” as code for disposable cell phones and SIM cards, “greens” for money, “running” for recruiting traders to the scheme, and referring to an “understanding” among GE, SAFI, and “our friend,” CC-1:<sup>5</sup>

SAFI:	Hi bro
SAFI:	Just arrived home
GE:	All good

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<sup>4</sup> Unless otherwise noted, all messages set forth below were sent via Facebook Messenger (also commonly referred to as “Messenger”), which is Facebook’s private instant messaging service for both one-on-one and group messaging. Messenger users can send messages, photos, video, audio, and files. Messenger also supports voice and video calling.

<sup>5</sup> Unless otherwise noted, all capitalization, typographical, and spelling errors herein are set forth as they appear in the original messages.

SAFI: Did you get the shoes with the socks?

GE: Yeah

GE: 1 shoe

GE: I didn't get my greens tho hahahahhaah?

GE: But its all cool our friend and I have an understanding

SAFI: Is that shoe good for running?

SAFI: Can you run against 5-8 guys with it?

SAFI: The greens you will pick up next time you come before the Trop

SAFI: Trip

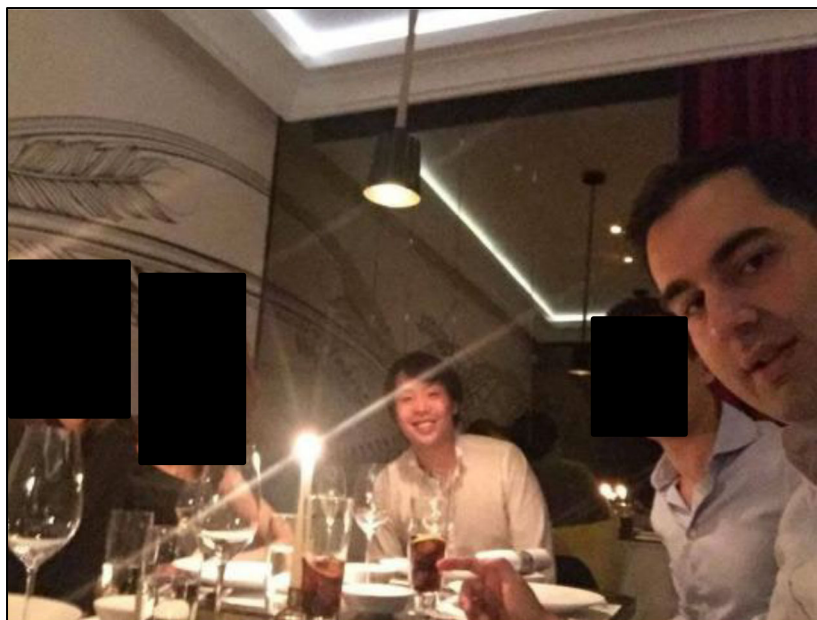
SAFI: But we have a [clapping hands emoji] on that

GE: OK

GE: Yeah can run

46. Below is a November 2016 photograph of GE (middle), CC-1 (second individual from the right), and SAFI (first individual from the right) at the Paris restaurant owned by CC-1 and SAFI:





**November 2016 – January 2017: GE’s Initial Recruitment of Traders and Banvit**

47. As part of the scheme, and as set forth below, GE recruited other traders by providing them with MNPI from SAFI and others about forthcoming corporate transactions and other MNPI that the traders could “watch”, as a way of assessing the accuracy of the MNPI, before agreeing to kick back 50 percent of future illicit trading proceeds to GE, SAFI, and others. One of those transactions was the January 2017 announcement that BRF S.A. (“BRFS”), a Brazilian food-processing company that traded on the New York Stock Exchange, would acquire Banvit S.A. (“Banvit”), a Turkish poultry-processing company, which traded on the Istanbul Stock Exchange.

48. For example, on or about November 18 and 19, 2016, beginning the same day that GE traveled to the Paris restaurant to meet with SAFI and CC-1, GE engaged in the following message exchange with CC-4, whom GE recruited to the scheme:

GE:	Bro got a serious business opportunity to talk about. If you’re down for a serious talk I’m willing to fly back to discuss. Its pretty sensitive but huge upside
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CC-4: Hey dude

GE: Yo

CC-4: What is it about

GE: Haha remember the time we were talking about how you plan your investment?

GE: I asked if you're into stocks etc and you told me something

GE: That's what its about

CC-4: Yea I have someone taking care of that

CC-4: It's under my family's portfolio

GE: I have an offer too if you're down

CC-4: In fact I was in hk discussing just that

GE: You can choose to watch and we can play on the next one if you see my resources are credible

CC-4: Sure let me have a look I don't wanna commit too soon

GE: I'll have to meet you in person to talk

GE: Which country you at I'll fly from Europe

GE: Within the next week or so

CC-4: Dude that's pretty drastic can I mull it over

CC-4: Unless ur in Bali?

GE: Yeah sure think about it its happening within the next 10 days but no pressure because I'm gonna meet other people too

GE: Like I said you can choose to watch

GE: To gauge my credibility

CC-4: It's not about credibility

CC-4: It's more about I like to know what I'm getting into

GE: Well it's pretty by the books but still sensitive

CC-4: Not in the habit of putting money into something I don't know about

CC-4: Can u describe it without giving it away

GE: I cant. Just in person but its pretty standard

GE: Just have to trust me. You'll have the info when we meet then decide at the time. No pressure bro for real lol

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GE: Haha! Trust me I think this is one of those deals you were waiting for

CC-4: Cool can't wait to see it

GE: Awesome

CC-4: Can I ask if it's tech or commodities?

GE: Commodities

CC-4: Oky

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GE: I'll give you a call from a secure line tomorrow

GE: I'll let you know when exactly when I know

CC-4: Ok

49. Two days after GE's meeting at the restaurant, on or about November 20, 2016, GE and SAFI engaged in the following coded message conversation about GE recruiting traders to the scheme:

GE: Already raced against one guy he's happy with the way I run

SAFI: Wow

SAFI: Business business business

GE: Eamma [CC-11's first name] insists on whatsapp lol<sup>6</sup>

GE: Haven't told him shit

GE: He's calling me now

GE: Just ran with the black guy looks good just 3-4 more guys to go

SAFI: Wow

SAFI: Sounds awesome

GE: This shit is easier than I thought

GE: Everyone knows what's up lol

SAFI: I told you

SAFI: Everybody will start sucking your d\*\*\*

GE: I thought peeps are gonna be more apprehensive

SAFI: No

50. The following day, on or about November 21, 2016, GE and SAFI engaged in the following coded message conversation about GE's "socks," code for sim cards, not working in Milan, Italy, and recruiting additional traders to join the scheme:

GE: check your email

GE: btw mysocks doesn't work in milan. i think only in paris can you call [CC-1's first name] to check?

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<sup>6</sup> WhatsApp is a cross-platform end-to-end encrypted messaging app that allows users to send text messages and voice messages, make voice and video calls, and shares images, documents, user locations, and other content.

GE: otherwise ill try to get a new sock in milan and throw away this one

GE: also, I'm approaching a bunch more people

SAFI: Ok perfect and check your email I answered [winking face emoji]

51. On or about the same day, GE sent the following message to CC-7, whom GE was recruiting to join the scheme: "anyway about the phone convo. It's about some information but it's sensitive but it's pretty big. Trade related. I'll call you on a secure line."

52. Later the same day, GE and SAFI engaged in the following coded message conversation about disposing of "socks and shoes" and using new sim cards and disposable cell phones, to prevent GE from getting "trapped" and to ensure that law enforcement did not "find the other socks as well":

GE: btw i got the number of [Individual 4's] friend

SAFI: Wow

GE: and the funny thing is she's exiting the china marketing in investments because it's 'too controled' now haha

SAFI: So just get your shoes clean for [Individual 4's] friend

GE: yeah

GE: img etting

SAFI: And get the other socks

SAFI: Out

GE: yep

GE: you think i need a new shoe?

GE: or same shoe is fine but new socks

GE: Hk is gonna watch the race

SAFI: Who is Hk?

SAFI: But new socks and shoes is a must bro

GE: both socks and shoes?

GE: you sure?

GE: idk where i can get shoes in paris

SAFI: Yes

GE: cant get just socks?

SAFI: Because that's the major mistake people do

SAFI: Btw

GE: because [CC-1's first name] told me its fine

SAFI: You aren't in Milan?

SAFI: Ok if he said

GE: im in milan

GE: ask him again

SAFI: But usually try to frequently change

GE: ill change after every game okay?

SAFI: Because if you will be trapped with the shoe in a new sock

SAFI: They will find the other socks as well

GE: same enough?

GE: ook

GE: safe

SAFI: You can do it this time

GE: ok

SAFI: But try to stick to the other method

GE: ok ill throw away my shoe this time too i guess

53. Later the same day, GE and SAFI engaged in the following message conversation about recruiting others to the scheme, including CC-7, from whom SAFI and GE were also attempting to obtain an investment in a technology company SAFI founded, which was unrelated to “the race”, with GE stating that he would obtain a new “shoe” after “this deal”:

SAFI: Did [CC-7] answer you?

GE: yes

GE: hes not down

GE: im tryin to talk to him about the other stuff

GE: the race

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GE: and we wanna do the other deal with him with the shoes and stuff

SAFI: Yes

SAFI: He knows about the other stuff?

GE: not yet

GE: i asked him if he wanna know

SAFI: And?

GE: he havent replied

SAFI: is this Guy liquid?

GE: yes

GE: lol

GE: hes a trader

GE: he started by trading energy futures

SAFI: Ok

SAFI: Then I am sure

SAFI: He will suck your d\*\*\*

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SAFI: 100% he will start sucking you instantly

SAFI: Like most people will do in future

GE: yeah ill work it out

SAFI: Already running on new shoes?

GE: i think shoes is fine for now i need new socks and thats it

SAFI: Ok but why don't you get it?

SAFI: Isn't it an easy one?

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GE: its the same but still dont think I need one for now ill get it after this deal

54. On or about November 24, 2016, SAFI sent GE a message telling him that GE “should invite | And onboard | More watchers | To give them appetite for the game” and “race is on the way – Check out [smiling face emoji].” GE responded by asking whether it was “safe to check with my computer? Or no,” referring to whether he could search for news about the forthcoming transaction on the internet. SAFI replied: “No better run outside.” On or about the same day, SAFI sent the following message to GE about forthcoming profits from the scheme: “Millions are like 12-15 months away in worst case | 100s of k | Just few months.”



55. On or about the same day, after GE proposed to Individual 8 that GE would fly to Singapore to discuss the scheme “face to face” with him, GE and Individual 8 engaged in the following message conversation, in which they discussed a “Brazilian poultry” company and GE instructed Individual 8 on the need to keep their discussions “really really discreet [sic]”:

Individual 8: funny enough, i have a good friend who’s in the brazilian poultry Business

GE: haha nice

Individual 8: what was the brazilian company’s name again?

GE: like i said we could talk and see if perhaps you have some friends too

GE: ill give you a call

Individual 8: k

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GE: anyway look you know all you neednow. Let’s see what we can do for te next deal yeh

Individual 8: alright

GE: we have to keep our communication about this low tech yeh

Individual 8: can

Individual 8: oh shit

Individual 8: the brazilian friend works for the company that you mentioned haha

GE: haha fun fun

GE: bro you really have to keep it like really really discreet about all the stuff we discussing

56. On or about December 13, 2016, GE and SAFI exchanged messages discussing their upcoming trip to Singapore and Hong Kong to recruit traders to the scheme, and the fact that

they were scheduled to fly together from Dubai to Singapore the following day, December 14, 2016, with GE discussing his goal of recruiting CC-4 to “racing” and SAFI asking if CC-4 was “watching at the moment” the forthcoming Banvit transaction:

SAFI: Dubai Singapore

SAFI: We are seated together

GE: great bro

GE: has a lot to catch up on

SAFI: Yes

SAFI: Saturday we will fly 6am morning

SAFI: To Hong Kong

SAFI: Arrival 10am

SAFI: So we have the whole Saturday

SAFI: And the whole Sunday

SAFI: For meetings

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GE: but literally my entire trip is made with one guy in mind

GE: literally just him would be worth

GE: because he actually talked to me about racing before me and you even met

GE: and his family is one of the wealthiest in hk

SAFI: Who would be worth?

GE: my friend called [CC-4 first name]

SAFI: Ah ok

SAFI: He is watching at the moment?

GE: yeah he did

57. Below is a photograph, taken by Individual 4, of GE (left) and SAFI (right) during their trip to Hong Kong in or about December 2016:



58. Following their trip to Singapore and Hong Kong to recruit traders to the scheme, on or about December 18, 2016, GE, SAFI, and CC-5 (whom GE and SAFI were soliciting to recruit additional traders) engaged in the following group message conversation, in which CC-5 referred to the timing of the forthcoming “acquisition,” and expressed puzzlement about SAFI’s coded responses, and GE then called CC-5, apparently to instruct him not to discuss the scheme so explicitly on Facebook:

CC-5: I have got a question again...When is the acquisition will be happening ?

CC-5: In January ?

SAFI: In January I might sell shares in my restaurant [winking face emoji]

CC-5: I mean the Stock code that u just gave me.

Less than 30 seconds after CC-5 asked about the “stock code that u just gave me,” GE initiated a Facebook voice call, which lasted less than 30 seconds. The group message conversation then continued:

CC-5:	Understood bro
CC-5:	Thanks a lot
GE:	All good bro
CC-5:	Should we also get a group chat on whatsapp?
CC-5:	[winking face emoji]
GE:	I have no whatsapp but you can simply Add eamma up. I’ll get one asap when I’m back in milan

59. The following day, on or about December 19, 2016, GE and CC-5 engaged in the following coded message conversation about the “Turkish dish” and using the “chicken as a test dish,” code for the Banvit acquisition, with CC-5 adding that the “uncles” he was attempting to recruit as traders were interested in “US dishes”:

CC-5:	Btw...those 2 uncles they didn’t buy the chicken.... they are observing how’s the chicken being cooked..... they don’t like Turkish dish... they like US dishes..... and they are getting used to London and US dishes that’s why.... They are now seeing the chicken as a test dish.... Let them seeing how tasty of the dish that the chief can cook
GE:	thats exactky what we need you did great bro

60. On or about December 31, 2016, SAFI and GE engaged in the following coded message conversation about the “race,” and recruiting traders, including CC-7, who was “closed,” but some of whom were “still watching”:

SAFI:	Are we closing something in the new year?
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GE: my boy [CC-7's first name] is closed

GE: but we need to talk numbers

GE: the rest still watching

GE: since the race isn't over yet?

SAFI: Amazing

SAFI: Yes

SAFI: It will be over very fast

GE: as soon as it happens

SAFI: So it means my friend we are already together successful!

GE: you'll be sure the news will hit my boys

GE: and they will see

SAFI: So amazing

GE: lol

61. On or about January 2, 2017, GE and SAFI engaged in the following coded message exchange, in which GE asked if there was "any news" because "everyones asking," and whether it was "safe" to "check on the race on [his] computer" so "I don't have to ask you again":

GE: so any news bro?

SAFI: Hi bro

GE: yo bro

GE: everyones asking again hahah

SAFI: Bro just wait

SAFI: Everything is fine

SAFI: But don't write me that much

SAFI: I am in trouble

GE: ok

GE: what happened

SAFI: Will tell you next time

GE: if youre free these days come visit me inn milan

GE: lets chill for a bit

SAFI: Yes I try

GE: haha

SAFI: I will be tomorrow in Munich

GE: nice

SAFI: How are you bro?

GE: im good chilling

GE: btw ut;s safe to check on the race on my computer right?

SAFI: Everything is going?

GE: like google it

GE: just checking

GE: so i don't have to ask you again

62. On or about January 9, 2017, at approximately 6:33 p.m., Reuters reported that BRFS and the sovereign wealth fund of Qatar had agreed to purchase the operations of Banvit in a joint venture. On or about the following morning, Banvit's stock price opened at 9.95 Turkish Lyra, an increase of nearly 13 percent from its closing price the prior day. On or about the day following the Reuters report, SAFI and GE engaged in the following coded message exchange about the "race" being "over finally" and GE "letting all my friends know":

SAFI: Hi bro I went to sports now I am really tired the race is over finally!

GE: fycj [slang for f\*ck] yeah nce

SAFI: So [winking face emoji]

GE: letting all my friends know now

63. Approximately one minute after GE's message to SAFI about "letting all my friends know now", GE sent the following messages to CC-5—with whom GE had previously spoken in code above regarding CC-5's "uncles'" interest in a "Turkish" "chicken" dish as a "test dish":

GE: hey bro

GE: news is out with the thing we talked about

GE: about

GE: you can let the uncles know and we can proceed to the next one

Later in the day, GE and CC-5 had the following message exchange, in which CC-5 referred to details (such as price) that confirm they were discussing the Banvit transaction, and GE directed CC-5 to "not talk so freely":

CC-5: Hey bro.... sorry replying u late... been busy for whole day [two loudly crying emojis]

GE: haha all good

GE: it's just exciting news!!

GE: your uncles would be happy now i think

GE: hahaha

CC-5: Did they make a public offer for subscribing shares from the present shareholders at \$10?

GE: yes

CC-5: it didn't reach to 10\$

CC-5: Only 9.xx\$

GE: the news is out today

GE: 6 hours ago

GE: check it now

CC-5: I looked on the google finance news, it didn't mention about public offer to subscribe shares from the present shareholders at 10

CC-5: Let me check again

GE: not yet but they announced the acquisition

CC-5: I only saw the acquisition was done

GE: thats all it takes

GE: yes

CC-5: yes

GE: thats enough

GE: it will be declared soon

GE: so its pretty much done

GE: btw lets not talk so freely on facebook hahaa

CC-5: haha

The conversation continued, with CC-5 telling GE that CC-5 “told your friend Eamma [SAFI] I want the US stocks rather than other countries” and GE explaining that traders participating in the scheme needed to “pay out.” GE also told CC-5, in substance, that SAFI would not discuss the scheme openly on Facebook, but would instead often change the subject to speaking in code “about his business” (as SAFI did in the December 18, 2018 exchange described above, in which he told CC-5 in code that he might sell shares in his “restaurant”):

CC-5: I have told your friend Eamma



CC-5: I want the US stocks rather than other countries

GE: i know

GE: we can give now

GE: but does your uncles want to play?

GE: because if they are now in the deal

GE: we will give now

CC-5: He keeps talking about his business hahaha but nevermind... I will try to ask if any prospect investor for him

GE: but they will be expected to pay out

GE: you know what i mean?

GE: we already have deals existing

CC-5: Eamma talked about his tech company haha

GE: yeah i understand

GE: let me give you a call later

CC-5: Sounds like he has no interest to talk about stock

CC-5: Haha

GE: he does

GE: but not over facebook

GE: haha

CC-5: Okay sure haha

GE: bro we would make bank on this

GE: this one was just to show them

GE: now they see me and you are for real

GE: they will put money down and make money

CC-5: Do they need to sign any agreements or contracts with u guys

GE: nope

GE: all trust basis

CC-5: Btw they are only interested in US or HK stock market

GE: i get it

CC-5: So we need to check their receipt of how many shares bought in order to calculate the % of commission

GE: bro

GE: lets not talk here

CC-5: Okay

CC-5: I will call u tmr on WeChat<sup>7</sup>

CC-5: Is that okay?

GE: ok

CC-5: [a thumbs up emoji and a winking face emoji]

GE: bro i just talked to my friend

GE: he was telling you about his tech company because lets not discuss other stuff here

GE: hahahahaha

GE: you cant get confused

CC-5: Haha lol

GE: haa

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<sup>7</sup> WeChat is a China-based social media messaging app.

64. On or about the same day, GE alerted other individuals whom he had attempted to recruit to the scheme about the Banvit transaction. For example, GE had the following message exchange with CC-11, whom GE was attempting to recruit to the scheme, with GE stating that the “news is out” about “the deal” and “the prophecy came true”:

GE:	hey bro just to let you know the news is out with the thing we talked about. The prophecy came true [smiley face emoji].
GE:	haha
GE:	I’m sure your friend is very excited to talk to us now.
CC-11:	U make the money?
GE:	of course bro
CC-11:	Ok
GE:	but this is just one deal
GE:	the sample
GE:	we have a new one every two weeks

In a message to CC-7 on or about the same day, GE wrote: “hey bro remember what we talked about – the news is out [smiley face emoji]. So we can start playing anytime[.]”

**February 2017 – June 2017: GE and SAFI’s Recruitment of CW-1, Pinnacle and Kindred, and the Paris Meeting**

65. As set forth in further detail below, CW-1 has admitted to investigators that he participated in the scheme from in or about 2017 through in or about 2020 by obtaining MNPI from SAFI and GE regarding several companies, trading while in possession of that MNPI in brokerage accounts in his own name and accounts that he controlled in the names of other individuals, and on at least two occasions—in 2018 and 2020—paying co-conspirators a total of over \$400,000 in illicit trading proceeds through transactions designed to conceal the source and recipients of the proceeds. According to CW-1, he met GE in or about February 2017, when GE

was in Los Angeles attempting to develop a film script that he had written. GE recruited CW-1 to participate in the scheme as a trader, including by providing MNPI to CW-1 from SAFI, via the encrypted messaging application Signal, that Pinnacle and Kindred were in confidential negotiations to be acquired. Later in 2017, GE arranged for CW-1 to travel to Paris to meet with SAFI and CC-1 as part of CW-1's recruitment to the scheme, and CW-1 agreed to kick back 50 percent of his trading profits in exchange for MNPI from SAFI and GE about future deals. According to CW-1, sharing trading proceeds was necessary because, among other reasons, as SAFI told CW-1, SAFI and other co-conspirators had to pay corporate insiders to obtain the MNPI. Additionally, according to CW-1, SAFI told him that, as part of the scheme, SAFI leaked MNPI to journalists in order to prompt news stories that would cause the companies' stock prices to react and allow the conspirators to lock in profits from their illicit trades. As part of the scheme, and at the direction of GE and SAFI, CW-1 took steps to conceal the scheme by communicating about it only in person or over disposable cell phones, by using messaging applications Signal and Telegram<sup>8</sup> with auto-deleting messages, and by speaking in coded language (including by referring to companies using female names with the same first letter as the name of a company).

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66. On or about February 20, 2017, GE sent CW-1 a request to be friends on Facebook.

67. On or about March 2, 2017, while GE was in Los Angeles, GE and SAFI engaged in the following message conversation about recruiting U.S. traders to the scheme, with SAFI

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<sup>8</sup> Signal is a cross-platform encrypted messaging service that uses the Internet to send one-to-one and group messages, which can include files, voice notes, images, and videos. Telegram is a globally accessible, cross-platform, encrypted, cloud-based and centralized instant messaging service. The application also provides optional end-to-end encrypted chats, popularly known as secret chat and video calling, VoIP, file sharing and several other features.

instructing GE to “be careful” and “super super discrete” when recruiting individuals in the U.S. and, GE agreeing that he would be “subtle[]” and “not say anything outright”:

GE: bro im thinking of talking to someone about the race that i met here

GE: he’s down to talk about my film tomorrow ill meet him and subtly gauge his interest in it

SAFI: Bro with Americans you always need to be careful never trust them

GE: yeah

SAFI: Bro really take care

GE: ill not say anything outright

GE: yeah for sure I will

GE: ill update you exactly how the meeting went

GE: and stuff

SAFI: Yes because that country is full of shitbags

GE: yeah for sure

GE: ill figure it when I meet him to talk about film

GE: he has a network with really wealthy people i met him in the Hills in one of those huge mansions you know i think if he can set me up direct with meetings we can do something

SAFI: Yes

SAFI: I think son

SAFI: [smiling face emoji]

SAFI: But here

SAFI: Again I am telling you

GE: and I took a look at the guys I know how they are like

SAFI: Super super discrete

GE: they are pretty mafia etc

GE: whcih means they probably doing some gangster s\*\*\* on the side haha

SAFI: Hahaha

68. On or about March 4, 2017, GE and SAFI engaged in the following message conversation about recruiting traders to the scheme in the United States:

GE: So I'm gonna do the intro empty handed you mean like straight up

SAFI: If you wanna

SAFI: I can give you something

SAFI: But I don't know how

GE: Can use socks and shoes no?

SAFI: You have some?

GE: I can get I think it shouldn't be a problem

SAFI: Yes if you have would be good

SAFI: But

SAFI: You could do an intro

SAFI: Empty handed

SAFI: And tell them if there is interest

SAFI: You could give them some

GE: Yeah but if they say they are interested during the meeting don't you think its better if I can straight give the sample?

GE: I wouldn't come in just to give the sample this time but I'll ask if they are down first

SAFI: I don't know bro

SAFI: Because US guys

SAFI: Can be son of.....

SAFI: They could pretend

GE: Don't push yourself

SAFI: And then fuck your the next day

GE: That's why I'm telling you to fly down

SAFI: I know bro

SAFI But I am really busy

SAFI: That's why I think

SAFI: You could make a first intro

SAFI: ?

GE: These guys are legit I mean you can see so they are exposed not us

SAFI: I got what you are saying

GE: Bro I don't mind doing the first into but I'm not sure I'm ready

GE: You get what I mean

GE: If they grill me I can't hold up the heat kindda

SAFI: You could be very gentle

SAFI: You can say

GE: For example if they ask: how many deals have you done?

GE: What was your last race?

SAFI: You could say

GE: And the one before that?

SAFI: Look

SAFI: I just wanted a first intro

SAFI: Because I am mostly doing the networking

SAFI: But I have things in hand

[SAFI calls GE on Facebook messenger and the call lasts approximately one minute]

GE: Just call normally IL talk normally lol

[SAFI attempts to call GE on Facebook four times]

GE: What's the problem with the call

[SAFI attempts to call GE on Facebook]

SAFI: Could we use skype?

GE: There's no point trying the same thing over and over you want I can give you my phone number

GE: And talk there

GE: My US phone

SAFI: Yes give me

GE: It's my number tho I'm keeping this

GE: Isn't a sock

SAFI: Ok

69. On or about March 9, 2017, GE and SAFI engaged in the following message conversation about recruiting CW-1 to the scheme:

GE: So we have hit quite a few people already

GE: I pick things up fast don't I ahhaa

SAFI: Yes bro you do



SAFI: But nothing new for me I know good people

GE: [The name of CW-1.com]

GE: hes interested in racing too

GE: me and him became quite close friends actually

GE: like actual friend friend we hang out and chat all the time

SAFI: Who is that guy?

GE: hes a good friend of mine that I met here

GE: his profile is right there

GE: worth about 10 mil

SAFI: Sounds great

\*\*\*

GE: [CW-1's first name] has an apartment in Czech

SAFI: [winking face emoji]

GE: so we can meet around Poland

70. On or about April 18, 2017, SAFI began to purchase shares of Kindred.

71. On or about April 26, 2017, GE sent CW-1 the following messages about the Kindred and Pinnacle sample MNPI: "btw its free you know that right," and "you don't need to pay us a cent for the first ones".

72. On or about May 15, 2017, SAFI began to purchase shares of Pinnacle.

73. On or about May 31, 2017, GE and CW-1 engaged in a coded conversation, during which GE instructed CW-1 to check his messages on Signal, and CW-1 thanked GE for

“introducing him to his two friend[s] today”—a reference to MNPI GE provided CW-about two stocks, Kindred and Pinnacle, over Signal, as set forth below:

GE: check Signal

GE: ;)

CW-1: Awesome I will check it out

GE: yep

GE: haha

GE: we can talk anytime here anyway

CW-1: how confident were you on that

GE: 100%

GE: :)

GE: and im giving it no strings attached

GE: but in the future when you can play with the size we are used to we can do deals together bro

CW-1: okay thank you bro I really appreciate it. It's just bad timing with my available funds.

CW-1: but I'm definitely going to do something and let you know what I did

GE: Ok

CW-1: hey I'm leaving next week for Czech Republic. Are you going to be in Europe any time in the next 5-6 weeks?

CW-1: I'm going there to have fun a bit while I manage getting my apartment there remodeled.

CW-1: and hopefully when I see you I will be thanking you for introducing me to your two friend today (:

GE: Haha for sure

74. On or about the same day, CW-1 began purchasing Pinnacle and Kindred call options.<sup>9</sup>

75. On or about the same day, after the market closed and after CW-1 purchased the call options on the basis of the MNPI from GE, the Reuters news service reported that Conagra Brands had approached Pinnacle to express interest in acquiring the company. Pinnacle's stock price—which closed on May 31, 2017 at approximately \$60.30 per share—opened the following morning at \$65.83 per share, an increase of more than 9 percent.

76. On or about the following day, June 1, 2017, GE and CW-1 engaged in the following coded message conversation about the Pinnacle news and the after-hours increase in the company's stock price. In the conversation, CW-1 referred to the companies as “girlfriends” and requested that GE introduce him to “more hot girls like that” in the future, prompting GE to note that “eventually we need to take a covercharge,” which was code for the fact that CW-1 would need to kick back a cut of his proceeds on future illicit trades:

GE:	bro the news hit 6 hours ago
CW-1:	Yeah I saw the after-hours party
CW-1:	[minion celebrating GIF]
GE:	Boom
GE:	I hope you brought some friends to the party
GE:	;) )

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<sup>9</sup> Call options are a type of security that gives the buyer the right to buy a stock at a specified price—known as the “strike price”—within a specified timeframe. Call options are a way of profiting from the near-term appreciation of a stock's price, but such options are worthless if the stock's price does not appreciate beyond the strike price, by at least the cost of the option, by the time the option expires.

CW-1: It was a little bit last notice for me to bring all my friends but a few of us got into the club before it closed

CW-1: Thanks for hooking me up with your girlfriends they're pretty fucking hot

CW-1: Hey bro I know im gonna owe you one, just know I will return the favor

CW-1: Meanwhile if you have any more hot girls like that for me to tag here, hmu!

GE: yeah all good

GE: anytime bro

GE: but I told you eventually we need to take a covercharge for taking them tot the club

GE: and you know the number

GE: ;

CW-1: Absolutely

77. On or about June 2, 2017, at approximately 10:23 a.m., CNBC reported that deal talks between Conagra and Pinnacle had concluded. At approximately 11:58 a.m., CW-1 sent GE the following messages: "Hey bro that one girl is being a total bitch. I spent a bunch of money on her but she isn't putting out. Should I hang with her or dumped her now[?]" GE and CW-1 then engaged in the following coded message exchange:

GE: Or if youre talking about the 2 girls I introduced 2 days ago. one of them you can spend up to 70 on the other would be like 15 so when see you're spending a dollar close to that just fuck it

GE: ;)

GE: Don't worry I'm right can't believe what the news say about models you know lol they don't know shit

CW-1: right, yeah that's what I was wondering. Her emotions were really up and down after what that guy Marks said about her

CW-1: you know, what Mark said in the news

CW-1: I'll hang in there and hope to get laid then (:

GE: Yeah fuck it

GE: Don't worry

CW-1: ok

GE: ;)

CW-1: That guy Mark is always fucking wrong, total moron actually I know him from before

GE: Yeah haha

GE: And plus what he said is completely wrong

CW-1: DAMN! I knew that, because he is ALWAYS wrong! But I wasn't sure enough otherwise I would have danced a little more(:

GE: Like the person who's interested in marrying her isn't the one they said in the media.

78. In addition to CW-1, GE also tipped others about the Pinnacle and Kindred MNPI. For example, on or about June 2, 2017—the same day as the CNBC report—GE engaged in the following message exchange with CC-4, stating that he would “give you names just take the first letter of those” or could discuss on “telegram or signal”:

GE: Yo bro just wanna let you know don't worry about how voliltile the stuff I gave is today it's still good

CC-4: Yea I'm just waiting on a response

GE: Yeah great

GE: Let's meet again on Monday if possible

CC-4: Sure my guy can't find the symbol on Nasdaq  
GE: which one?  
GE: give me a call  
CC-4: I can't now  
CC-4: Inna bit  
GE: ill call you  
GE: its NYSE  
GE: btw  
GE: HAHA  
CC-4: Yea Nasdaq  
GE: both of them  
CC-4: I'm busy at the moment  
GE: okay  
GE: just call me when youre free  
GE: when you call me ill give you names just take the first letter of those okay?  
GE: bro  
GE: or can you just get telegram or signal?  
GE: ill write you there  
CC-4: Yea I have telegram

Four days later, on or about June 6, 2017, GE engaged in the following message exchange with CC-6 about Pinnacle, with CC-6 asking about the "stock tip" about "Pinnacle Foods," and GE stating that it was "not wise to talk here" and that he would rather "talk in person":

GE: I think we gave you a little tip the other day and I just wanna have a sit down to let you know how we work and how we get these tips

GE: think it's pretty attractive for you

CC-6: the stock tip?

CC-6: in USA

GE: yeah but better talk in person hahaha

CC-6: Pinnacle Foods

GE: yeah bro not wise to talk here

GE: let's talk in person

CC-6: the announced acquirer want what he said

CC-6: was not?

GE: the news is wrong

CC-6: ok sure

GE: we would talk

GE: rumors flying everywhere

CC-6: well the price dropped back sharply

GE: yeah we will talk about that too

79. On or about June 7, 2017, GE sent CW-1 a message inviting him to Singapore on June 16 to meet with "his partners."

80. On or about June 12, 2017, CW-1 and GE engaged in the following message exchange about using disposable phones and Signal:

CW-1: Hey bro do you have a minute for a signal chat

GE: Yeah

CW-1: I'll pick up another one of those phones

CW-1: I'm in Europe now so easy to find

GE: Nice bro

GE: Don't worry signal is fine if we talk like that

CW-1: ok

CW-1: cool.

CW-1: txt'd you over there

81. On or about June 15, 2017, SAFI and GE met in Singapore with CC-7, whom GE had previously told SAFI he had recruited to the scheme. Below is an image of SAFI (second from left), GE (third from left), and CC-7 (right) in Singapore in June 2017.



82. On or about June 16, 2017, GE sent CC-4 a message that SAFI was “in town” in Singapore, and inviting him to discuss an “update on deals.”



83. On or about June 17, 2017, GE likewise invited CW-1 to meet SAFI in Singapore: “Hey bro my partners are leaving tomorrow. If you’ve no chance to come I’ll try to arrange a meet in Paris,” and “I’ll hook it up. To meet them and dine at their restaurant.” CW-1 responded: “Ok that would be very cool.”

84. On or about June 22, 2017, CW-1 sent GE a coded message inquiring whether the Pinnacle and Kindred transactions remained on track: “If those two model chicks had a change of heart, you’d let me know right?” GE responded: “Yes. All good for now bro.” CW-1 responded: “cool, still just kissing for now hoping for a threesome soon [smiley face emoji].”

85. On or about June 25, 2017, GE and SAFI engaged in the following message conversation regarding the Paris meeting to discuss CW-1’s participation in the scheme:

GE:	hey bro
GE:	wondering if you in paris still
GE:	my friend [CW-1’s first name] wanna visit you guys
GE:	he’s down for racing
GE:	btw
GE:	if you’re not there perhaps he can meet [CC-1’s first name]?
SAFI:	Hi bro
SAFI:	I am in Paris
SAFI:	Where is he?
***	
SAFI:	What was his full name?
GE:	[CW-1’s name with typographical error in last name]
GE:	You can Google him

GE: [CW-1's name.com]

\*\*\*

SAFI: Bro update me on timing with [CW-1's first name]

SAFI: Since this week will be tight schedule and I have to know it on time

GE: yo bro

GE: my boy would update me by toomorrow

SAFI: Ok dear friend

\*\*\*

GE: OK so I can be in Paris pretty much any time between Wednesday and Sunday. So your guy can just name the day and I will make it work. All I ask is that we don't change the appointment, since I will book an in-and-out round trip around the meetin.

GE: That's what [CW-1's first name] said

GE: so you can aname the day

SAFI: Ok whether 29<sup>th</sup> lunch

SAFI: Or 30th dinner

SAFI: Up to him

SAFI: However he can make it work

GE: I think better 29<sup>th</sup> lunch

GE: but im asking him now

\*\*\*

SAFI: Confirm me the dates once you know from [CW-1's first name]

GE: yep I will

86. The following day, on or about June 26, 2017, GE and SAFI exchanged the following messages about the meeting in Paris with CW-1, with SAFI asking if CW-1 was “play[ing] the Patricia,” referring to Pinnacle:

GE: [CW-1’s name with typographical error in last name]

GE: said he would do lunch om 29<sup>th</sup>

SAFI: Ok confirmed

GE: okay time and place?

GE: hexagon?

SAFI: Tell him 1:30pm 85 avenue Kleber

SAFI: Hexagone

GE: nice

GE: yep set

\*\*\*

GE: hes cool

GE: he’s one of us

\*\*\*

SAFI: I trust you

SAFI: Is he legit

SAFI: ?

GE: he’s legit

SAFI: Ok

GE: he’s not super big size but he’s legit

GE: you know when someone is not super big is easier

GE: and I feel quite comfortable for everyone

SAFI: How much time you spent with him

GE: quite a lot like total in person up to 7 days

GE: but we talk tons

SAFI: Have you been to his place?

GE: nope. but I checked him out he's legit and I see this kind of things by character

SAFI: And he was watching?

GE: he's watching

SAFI: and he's playing but I told him this one he can watch or play for free

GE: he said he's playing a bit too because he trusts me

SAFI: Great

SAFI: He plays the Patricia?

GE: he got a bit nervous because he was leveraging a bit I think

GE: for patricia

SAFI: Good

GE: so he was panicking a bit there haha

SAFI: Good

\*\*\*

SAFI: Bro you are the best

GE: hahaha

GE: yeah

GE: I know the right guys

87. On or about the same day, June 26, 2017, GE instructed CW-1 not to tell his significant other about the scheme because she could be “dangerous,” and noted that CC-1 and “Eama” did not tell their spouses:

GE:	but honeslty the thing we talk about
GE:	better not tell your wife
GE:	there’s no reason for her to know
CW-1:	ok, well if your partner has a preference just let me know
GE:	and she seems a bit unstable so might be a bit dangerous in the long run bro
***	
GE:	our other partner’s wife [a reference to CC-1] doesn’t even know he does this
GE:	I’m not sure if eama
GE:	eamma’s wife knows
***	
GE:	Happy birthday my brother!! Didn’t know it’s so close to the day anyway hope you have a good time in Paris too haha good that I already have a present for you [winking face emoji]

88. On or about June 27, 2017, CW-1 sent GE a message about his upcoming meeting with SAFI: “if it’s ok with you guys I will bring [Individual 2, CW-1’s significant other] to lunch and then have her take off and look at shoes while Eamma and I talk business.”

89. Later the same day, GE sent CW-1 a coded message, in which he referred to Kindred as “Kelly” and advised CW-1 that the Kindred transaction was delayed and that he should sell the stock: “Kelly is out of our vision for like 2 weeks so we are all getting out- we can come

back on guest list later.” On or about the same day, GE and CC-6 engaged in a similar coded message exchange, in which GE told CC-6 that Pinnacle was “fine” but to sell Kindred:

GE:                    hey bro if youre looking at the stuff I told you

GE:                    we are canceling our RSVP for Kelly’s party for the time being because she’s going missing for 2 weeks and no one knows her whereabouts

GE:                    and we like to be safe

GE:                    but everything else is still good

GE:                    anyway we planning to get back on guestlist with Kelly later

CC-6:                I don’t understand what you mean by Kelly’s party bro

GE:                    the thing I told you about

GE:                    same first name

GE:                    :)

GE:                    I told you 2 names kelly and patricia

GE:                    patrcia;s fine but kelly is missing for awhile

CC-6                ok I have been monitoring. both not moving anywhere really 4-8 weeks now

GE:                    yep all good we tell you the final date only you know

GE:                    itsa more for people to hold

On or about the same day, GE sent a similar message to CC-4: “Kelly is missing for 2 weeks so my friends stopped RSVPing her partying until she comes back,” to which CC-4 responded: “yeah I’m sinking my stuff into another deal...”

90. On or about June 29, 2017, CW-1 met with SAFI and CC-1 at the restaurant SAFI and CC-1 owned in Paris. During that meeting, according to CW-1, SAFI explained how the

scheme worked and directed CW-1 how to communicate with other co-conspirators in order to evade detection, including communicating via encrypted applications and removing CW-1's SIM card while discussing MNPI with SAFI on Telegram. Below is a photo of SAFI and CW-1 drinking champagne on or about June 29, 2017 in Paris, which SAFI sent to GE, who responded, "Boom!! You guys look great."



91. On or about June 29, 2017, GE sent messages to CW-1: "Hey bro," and "How's the meeting with eamma." CW-1 responded on or about June 30, 2017 and CW-1 and GE explained to CW-1, in code, that the kickback percentage would be 50 percent on future deals, "but Patricia is free":

CW-1: Hey meeting was great. Thanks for the intro. (:

GE: Nice

GE: You calm you happy? Haha

CW-1: I will be, but right now im a little behind

GE: Haha okay

GE: Anyway now can ask him anything and you guys have direct contact so it's easy

CW-1: I understand the game different now so I won't make the same mistakes again.

CW-1: What did you tell me the cover charge was?

GE: It'll be higher than 70 which I told you originally

GE: Way higher

GE: Bidding war going on now

CW-1: I meant the % for you guys

GE: 50

GE: I told you haha

GE: Promoters take 50% profit off the door sales

CW-1: Ok got it. I must have made up some shit in my head then, I remembered different. But no worries it works.

GE: Yep

GE: You know we have the best parties

GE: How was the food there

GE: At the restaurant

CW-1: No doubt

CW-1: Food was awesome

GE: BTW bro it's 50% but Patricia is free

GE: Bro

GE: If he told you something else there

CW-1: Definitely the best lamb i ever had.



GE: That one would be the next one and it'll be charged

CW-1: Got it.

92. On or about the same day, June 30, 2017, CW-1 sent SAFI a friend request on Facebook. One day later, the message exchange between GE and CW-1 regarding CW-1's meeting with SAFI continued:

CW-1: Hey! Had a great time there, Eamma took really good care of us.

CW-1: I really like him, he is a very cool dude

CW-1: and his fiancée is really classy and smart, which says a lot about him also

CW-1: I think I also wasn't so clear with him that in a few months I should have a LOT more money to invest when I close my deal on my business

GE: Yes

GE: Haha

CW-1: but for now, I really do appreciate that you guys are willing to work with me now even though I'm not a big fish for you.

CW-1: but we can definitely get started and I agree to the party rules (:

93. On or about June 30, 2017, GE also told SAFI that he had discussed with CW-1 their "basket size"—code for their percentage kickback on illicit trading:

GE: How's [CW-1's first name]

SAFI: [CW-1's first name] is ok

SAFI: But super small

SAFI: But no worries

SAFI: I found a deal for him

SAFI: He will be fine

SAFI: After a while

SAFI: But really good guy

GE: Yeah he can slowly get involvrd

GE: Yeah he is right

\*\*\*

GE: I told [CW-1's first name] about our basket size soon

SAFI: I talked with [CW-1's first name]

SAFI: Don't worry

GE: I mean

GE: not soon

GE: but before

GE: I told him before

SAFI: Yes

GE: so he should have no confusion

SAFI: I had a talk with him

GE: yep

SAFI: He was quiet honest

94. On or about July 8, 2017, GE and SAFI engaged in the following coded message exchange in which SAFI told GE that “Kelly”—the Kindred transaction—was “off the table” and that “Patricia”—the Pinnacle deal—would “take longer”:

GE: Btw wondering if your friendsfound Kelly yet haha

GE: Just remembered some stuff I forgot to ask

GE: Im asking because the cover charge for her party is still going up so it seems like the party is still on somehow

GE: bro??

SAFI: Hi bro

SAFI: Kelly is off the table

SAFI: You should check her news

GE: ok

GE: patricia is still on yeah

GE: you wanna talk on other?

SAFI: Patricia will take longer

95. Ultimately, both transactions were announced, after a delay. On or about December 19, 2017, Kindred announced that its board of directors had approved a definitive agreement under which it would be acquired by a consortium of three companies for \$9.00 per share in cash, representing a premium of approximately 27 percent to Kindred's 90-day share price for the period ending December 15, 2017, which was the last trading day prior to media reports regarding a potential transaction. Likewise, on or about June 27, 2018, Conagra and Pinnacle announced that the companies' boards of directors had approved a definitive agreement under which Conagra would acquire Pinnacle in a cash-and-stock transaction that valued Pinnacle's shares at approximately \$68.00 per share.

**July 2017 – August 2018: ABCO, Gemalto, Syntel,  
and the Cash Payment from CW-1 to SAFI**

96. Following GE's recruitment of CW-1 to the scheme and the June 2017 meeting in Paris that GE arranged, CW-1 obtained MNPI from SAFI and GE in advance of several corporate

announcements, and traded while in possession of that MNPI in accounts in his own name and other accounts associated with Individual 1 and Individual 2 that CW-1 controlled.

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97. For example, on or about July 5, 2017—following SAFI’s June 30, 2017 statement to GE that SAFI “found a deal” for CW-1—CW-1 began purchasing shares of ABCO. According to CW-1, SAFI tipped CW-1 ahead of the news that ABCO was in discussions to be acquired, and CW-1 acquired ABCO securities on the basis of that MNPI.

98. SAFI began to purchase ABCO shares on or about the following day, July 6, 2017.

99. On or about that same day, July 6, 2017, the Bloomberg news service published a news story—less than one hour before the stock market closed—reporting that UnitedHealth and the private equity firm Vista Equity Partners were nearing a deal to acquire ABCO, with the intention of subsequently splitting up the company. ABCO’s stock price opened approximately 7 percent higher the following morning compared to the prior day’s opening price.

100. On or about July 9, 2017, GE and CW-1 engaged in the following coded messages about ABCO and CW-1’s trading:

CW-1:	and any chance you know when the next other party is?
CW-1:	don’t bug anybody about it, just curious if you knew
GE:	not yet it’ll take awhile I think
GE:	ill sort everything out this week
CW-1:	despite being late to the advisor party, I still had a nice time (:
GE:	last week a bit stretch
GE:	stretched

CW-1: ok no worries, I'm sure E will contact me when he has something

GE: I think my friend told you everything you ended anyway

\*\*\*

GE: eamma brought his wife a 1.4 mil ring recently

\*\*\*

CW-1: yeah I saw that ring. Stunning.

101. On or about August 29, 2017, prior to the opening of the stock market, ABCO announced that it had entered into a definitive agreement to sell its healthcare business to Optum and to sell its education business to affiliates of Vista Equity Partners. ABCO's stock price increased more than 6 percent following the announcement.

102. According to CW-1, in or about November 2017, SAFI tipped CW-1 ahead of the news that Atos planned to make a bid to acquire Gemalto. ATOS did not publicly announce the acquisition proposal until on or about December 11, 2017.

103. At or about the time of the acquisition bid, CC-2 worked at ATOS as vice president of mergers and acquisitions and corporate development and—according to documents produced by Atos—had access to MNPI regarding Atos's offer for Gemalto prior to the public announcement. As noted above, CC-2 was an investor in the restaurant owned by SAFI and CC-1, and previously worked at Merrill Lynch at or about the same time that CC-1 worked there.

104. On or about November 24, 2017, SAFI began to purchase shares of Gemalto. SAFI described the Gemalto deal to CW-1 as a “sniper”—code for precise MNPI that the conspirators had obtained from a corporate insider.

105. CW-1 began to purchase Gemalto ADRs five days later, on or about November 29, 2017.

106. On or about Friday, December 8, 2017—the last trading day before Atos publicly announced its bid for Gemalto—CW-1 instructed Individual 1 to purchase Gemalto shares based on the MNPI he had obtained from SAFI: “FYI, last chance to buy GTOMY before it takes off (:”

107. On or about December 11, 2017, Atos announced that it had made a formal proposal to acquire Gemalto for approximately 4.3 billion Euros—more than \$5 billion—representing a premium of approximately 36 percent to Gemalto’s prior stock price.

108. Later that same day, on or about December 11, 2017, CW-1 removed SAFI as a friend on Facebook in an attempt to conceal their relationship. Similarly, on or about April 10, 2018—the same year that CC-1 was charged with securities fraud in France arising out of an alleged insider trading scheme—CW-1 and GE engaged in the following message exchange about the fact that SAFI, their “mutual friend,” wanted them to delete incriminating Facebook messages, with CW-1 telling GE that he was communicating with SAFI on “tele” (Telegram):

CW-1:	hey bro, talking to our mutual friend – we need to delete our old group chat from our intro last summer
GE:	ok
GE:	done
GE:	what happened
GE:	you got heat?
CW-1:	no not at all, everything is fine but he is just being proactively careful
GE:	ok great
GE:	im happy to hear that
GE:	im meeting him in a few days
GE:	what else is up

CW-1: also delete from archives if you can

GE: yeh

CW-1: ok nice!

CW-1: yeah we are chatting on tele now

GE: ok

CW-1: he says we should also delete our chat here, you and me, because his name might have been mentioned

109. Gemalto rejected Atos's acquisition proposal on or about December 13, 2017. Four days later, on or about December 17, 2017, Gemalto announced that it had agreed to be acquired by Thales for approximately \$5.4 billion.

110. On or about December 26, 2017, CW-1 and GE engaged in the following coded message exchange about the Gemalto deal:

GE: Yo bro merry Christmas!!

GE: Hope you're good and hope you're satisfied with the gift from eamma and I! [winking face emoji]

CW-1: hey yeah bro, Merry Christmas!!!

GE: haha

CW-1: more to say but I won't say it here

CW-1: but thank you, thank you, thank you

GE: haha all good bro

111. According to CW-1, SAFI tipped CW-1 ahead of the news that Syntel had agreed to be acquired by Atos, news which was not publicly announced until on or about July 22, 2018. As noted above, CC-2 was employed at the time as Atos's vice president of mergers and acquisitions and corporate development, and—according to documents produced by Atos—had access to MNPI regarding the Syntel bid before it was publicly announced.

112. On or about June 27, 2018, GE and CW-1 engaged in the following coded message exchange, in which CW-1 referenced SAFI as “our friend” and referred to his discussions with SAFI on Telegram:

CW-1:	Hey if you happen to talk to our friend let him know I lost my Europe phone with the telegram app on it. I think I left it at my friend’s house in San Diego and I’m driving down there now to hopefully find it.
GE:	ok bro
CW-1:	I don’t think there’s anything urgent but if there is maybe you can be the middleman and let me know
GE:	sounds good
GE:	ill let him know

113. Two days later, on or about June 29, 2018, CW-1 began purchasing Syntel call options.

114. On or about July 2, 2018, SAFI also began purchasing shares of Syntel.

115. On or about July 22, 2018, Atos announced that it had agreed to acquire Syntel for \$3.57 billion, representing a substantial premium over the company’s average stock price over the prior month.

116. On or about August 13, 2018, 100,000 Euros in cash were withdrawn from a bank account held in the name of Individual 2, but controlled by CW-1. According to CW-1, SAFI instructed CW-1 to bring him 100,000 Euros in cash. At SAFI’s direction, CW-1 and SAFI agreed to meet in Vienna, Austria because SAFI did not want CW-1 to take a train from the Czech Republic, as there would be a record of the ticket purchase. As instructed, CW-1 traveled to Vienna, Austria by Vespa and personally delivered the cash to SAFI, as partial payment for the MNPI he had received.



**September 2018 – February 2019: Atos Negative Profit Warning  
and Atos Spinoff of Worldline**

117. On or about September 21, 2018, GE engaged in the following message exchange with an immediate family member, Individual 4:

GE:	im flying to nyc tomorrow [Individual 4]
Individual 4:	Alone
Individual 4:	Why so hurry?
GE:	eamma will meet me there
GE:	then going paris
GE:	need 1 week there to meet some investors and shit
Individual 4:	Very careful to do that
GE:	for snoopyo [Individual 4] <sup>10</sup>
GE:	not the other one
GE:	haha

118. According to CW-1, in or about October 2018, SAFI tipped CW-1 about another “sniper”: the fact that Atos would imminently announce a negative profit warning. As noted above, CC-2 was employed at the time as Atos’s vice president of mergers and acquisitions and corporate development.

119. On or about Friday, October 5, 2018, CW-1 and GE exchanged Facebook messages about plans to travel to Germany for SAFI’s annual Oktoberfest party. Below is a photograph of CC-1 (left) and SAFI (second from left) at SAFI’s Oktoberfest party the prior year:

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<sup>10</sup> Snoopyo was the name of the technology company that SAFI founded.



120. GE ultimately did not travel to Germany for SAFI's 2018 party. On or about October 8, 2018, CW-1 and GE engaged in the following message exchange, in which CW-1 referenced "good advice" he had received from "our friend"—a coded reference to the MNPI SAFI had provided about the Atos profit warning:

CW-1:	Hey bro, missed you this weekend!
GE:	Yeah bro haha
GE:	Unlucky
CW-1:	I won't be able to make it to Paris right now. I am in the midst of final deal negotiations selling my company and I am scrambling to deal with accounting and paperwork
GE:	Yeah
CW-1:	I have a mound of shit to handle
GE:	Wouldhe great bro once you're done
GE:	We will take business to another level

CW-1: Yeah for sure

CW-1: They want me to stay on and run the company

CW-1: Unfortunately we had some big losses this year, leaving me in a weak position. Otherwise I would be telling them to go f\*\*\* themselves

CW-1: And it is also the only way I can get them to buy my company

GE: Yeah unlucky bro

CW-1: I got some good advice from our friend though, so I might have a surprise for them

GE: Hahaha nice bro

GE: We will do good

121. Less than two weeks later, on or about October 22, 2018, a brokerage account CW-1 controlled in the name of Individual 2 began selling short<sup>11</sup> Atos contracts for difference (“CFDs”).<sup>12</sup>

122. On or about the following day, October 23, 2018, Atos’s stock price dropped more than 20 percent after the company announced that it was reducing its profit outlook for the remainder of 2018.

123. According to CW-1, SAFI and GE tipped CW-1 ahead of the news that Atos planned to spin off its Worldline business, news that was not publicly announced until on or about January 30, 2019. As noted above, CC-2 was employed at the time as Atos’s vice president of

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<sup>11</sup> Short-selling is a trading strategy that seeks to profit from an anticipated decline in the price of a security. Short-selling typically involves borrowing shares of stock and selling them, in anticipation of repurchasing them later at a lower price.

<sup>12</sup> CFDs are a form of security that allows investors in foreign markets to participate in the price movement of stocks traded on exchanges in the United States without actually owning the underlying stocks.

mergers and acquisitions and corporate development, and—according to documents produced by Atos and Worldline—had access to MNPI regarding the Worldline spinoff before it was publicly announced.

124. Prior to the Worldline spinoff, GE began to also play a trading role in the scheme, including by directing trading on MNPI through other co-conspirators, as set forth more fully below.

125. On or about November 14, 2018, GE and CW-1 engaged in the following message exchange, during which GE told CW-1 that he was “with our friend” SAFI. CW-1’s responses do not appear because he deleted them at GE’s direction:

GE: Am with our friend here hanging out

\*\*\*

GE: Btw

GE: I’m also started trading and such I’m wondering if you can recommend some books and materials for it as well

GE: Heard you’re really good

\*\*\*

GE: I mean I also wanna learn more technical stuff

GE: Nice

GE: I’ll read it

GE: What else is good

\*\*\*

GE: I need to learn more

GE: I have to be top 100 in the world in everything I do

GE: Including trading now that I’m doing it

GE: Haha yeah for sure

GE: I've reached top 100 status in literally everything I do

\*\*\*

GE: Haha yes bro but

GE: We can't talk about this here

GE: Please delete all hahaha

GE: We can talk on the other app haha

126. On or about January 3, 2019, GE sent himself the following Facebook messages:

GE: atos

GE: atos se

127. Later the same day, CW-1 and GE exchanged the following messages set forth below about “some plays coming”—code for forthcoming transactions based on MNPI. GE instructed CW-1 to switch their conversation to “the other,” which—according to CW-1—was a coded reference to Telegram or Signal, both encrypted messaging applications:

GE: yo bro whats good

GE: looks like theres some plays coming

CW-1: Nice! I do like a nice play (:

GE: yeah

CW-1: Need a bailout play actually

GE: haha

GE: yeha ill write you on the other

CW-1: Cool

128. Later that same day, GE sent the following messages to CC-8, another trader he sought to recruit to the scheme:

GE: [CC-9] told me a month ago that you might be interested in some investment opportunities

GE: haha

GE: thought perhaps we can meet. I've a present for you

129. Over the next several days, GE and CC-8 discussed meeting in person, before meeting on or about January 6, 2019 at GE's residence in Singapore. Thereafter, GE and CC-8 exchanged the following messages about moving their conversation to Telegram:

CC-8: Hey bro, what's your twitter handle?

CC-8: Oops, I mean Tele

GE: Write me a message

GE: hey broo

CC-8: Hey man

GE: I wrote you

CC-8: I received hey bro

CC-8: Haha

GE: well reply me there I made a secret chat lol

130. On or about January 9, 2019, GE and CW-1 exchanged the following messages:

GE: just wanted to chat

GE: Yo bro got some time now?

CW-1: yes

GE: Will write you on the other

CW-1: ok

On or about the same day, GE sent a message to himself referring to a specific “strike” price, indicating that the message related to Atos options.<sup>13</sup> Also, on or about the same day, GE sent CC-8 the following message: “Bro come on other now.”

131. On or about the following day, January 10, 2019, a brokerage account controlled by CW-1 in the name of Individual 2 began purchasing Atos CFDs.

132. On or about January 13, 2019, GE sent the following message to CC-8: “we still gotta do this deal. can you write me on the other when youre free thanks.” CC-8 did not respond that day.

133. The following day, on or about January 14, 2019, beginning at approximately 8:36 a.m. UTC, GE sent the following messages to CC-8: “Yo bro,” and “You ready to roll?” After CC-8 again did not respond, GE attempted to place a Facebook audio call to CC-8, which was not answered. Less than 30 minutes later, GE exchanged the following messages with CC-9, who had introduced GE to CC-8:

GE:	Hey bro can you do me a favor and give [CC-8] a call and ask him to contact me?
GE:	I’m in a deal with him will tell you more next time
CC-9:	I’m in kl bro
CC-9:	Oh is he investing?
GE:	Yeah let’s not talk here about this tho
CC-9:	I will wa him
GE:	Ok
GE:	Give me his WA number

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<sup>13</sup> As set forth above, the “strike price” of an option is the price at which the option holder is entitled to purchase the underlying security on or before the option’s expiration date.

CC-9: [Sends a screenshot containing CC-8's WhatsApp contact information]

Approximately 45 minutes later, CC-8 and GE exchanged the following messages:

CC-8: Hey bro

GE: Yo bro come on other

134. Later that same day, CC-8 began purchasing Atos call options.

135. On or about January 16, 2019, CC-8 and GE exchanged the following messages:

CC-8: ...If this deal make me a billionaire in usd, I resign tomorrow and will be 100x more easy to reach [smiling tongue out emoji]

GE: Haha yeah

GE: Not billionaire but millionaire is possible

136. GE also sought to recruit additional traders to the scheme using the MPNI about Atos's Worldline spinoff as bait. For example, on or about January 18, 2019, GE exchanged the following messages with Individual 5:

GE: Bro if we can meet asap

GE: Maybe you wanna come into another deal I'm doing

Individual 5: What's up

GE: I'll discuss with you in person

GE: Can't talk here

Individual 5: Ok

GE: I'll write you quickly on telegram

137. On or about January 28, 2019—two days before the Worldline spinoff was publicly announced—GE and CC-8 engaged in the following message exchange:

GE: get ready on 30<sup>th</sup> we can be ready to cash out already



GE: [winking face emoji]

CC-8: Ready anytime bro. Haha

138. On or about the same day, GE sent the following messages to Individual 4: “need to talk...we have a big play now...so if you can cash our all your current positions even at loss...and fund me...we can do...its a new one.”

139. Two days later, on or about January 30, 2019, GE sent CC-8 the following messages:

GE: hey bro

GE: please be very available today

GE: if you can get off work today

GE: you should

GE: from 4pm onwards

GE: be very available

GE: don't make any independent moves

GE: ill instruct you what to do

140. Four hours later, at approximately 8:03 a.m. UTC, GE and CC-8 exchanged the following messages:

GE: hey bro

CC-8: Hey

GE: you ready?

GE: just stay online and reachable from now on

141. Later that same day, January 30, 2019, Atos announced its intention to spin off a 23.4 stake in Worldline to its shareholders. Immediately following the announcement, Atos's share price increased more than 7 percent.

142. Thereafter, CC-8 sold the Atos call options he had purchased approximately two weeks earlier for a profit of approximately 95,000 Euros.

143. On or about the following day, January 31, 2019, GE and CC-8 exchanged the following messages about CC-8 sharing the proceeds from CC-8's illicit trading:

GE:	hey bro so now that you're out already you can should start transferring the profits on my share to your bank
GE:	since it might take a few days for the money to go back
CC-8:	Ok
GE:	Thanks bro

144. On or about February 1, 2019, GE and CC-8 exchanged the following messages:

GE:	hey bro
GE:	you got the money transferred yet
CC-8:	Hey bro, I initiated already, but looks like haven't received yet
GE:	Nice bro
GE:	Let me know when receive
GE:	I gotta collect from you asap gotta pay some peeps [winking face emoji]
CC-8:	Sure bro

145. On or about the morning of February 7, 2019, GE and CC-8 made plans to meeting that evening at the Fullerton Hotel in Singapore, so that CC-8 could deliver cash to GE.

GE: come to fulerton  
GE: we meet there  
GE: what time your work ends  
CC-8: Okays. 6 odd  
GE: Cool  
GE: so around 7pm at fullerton  
GE: and you got the cash ready yeh

146. That evening, at approximately 6:37 p.m. Singapore time, CC-8 called GE on Facebook, and they exchanged the following messages:

GE: Here?  
GE: Coming down now  
CC-8: Yup  
CC-8: Okaya

**February 2019 – November 2019: Medidata, Tiffany, Wright Medical, Walgreens, and GE's \$40,000 Payment for "Meat"**

147. According to CW-1, GE and SAFI also tipped CW-1 ahead of the June 2019 announcement that the French company Dassault Systems had agreed to acquire Medidata.

148. On or about February 19, 2019, CW-1 began purchasing Medidata securities, including call options. Some of those trades cleared over the Boston Options Exchange, in Boston, Massachusetts.

149. On or about April 2, 2019, CW-1 messaged Individual 1 that he was "loading up the truck on Medidata."

150. On or about April 3, 2019, GE sent the following messages to CC-9: "lets meet soon...we need to talk soon...the play is soon just got word."

151. On or about April 5, 2019, Individual 1 asked CW-1, in substance, whether her significant other should also purchase Medidata securities. CW-1 replied, “MDSO would be a good one yes, but I honestly don’t want to involve him in what we are doing. I hate to say it, but he just isn’t smart enough for me to risk involving him.”

152. On or about the same day, April 5, 2019, GE messaged CC-8: “Bro...Check the other app...Bro...I got something for you.”

153. On or about May 7, 2019, GE again messaged CC-8: “Yo get ready.” On or about the following day, CC-8 began purchasing Medidata securities.

154. On or about May 14, 2019, CW-1 and GE engaged in the following message exchange about “Maria,” which was a coded reference to Medidata:

GE:	yo bro
GE:	hows things
CW-1:	stressful bro, not having a good time right now
CW-1:	working my ass off and not enough energy to handle it all
CW-1:	Hopefully Maria will help take a little stress off next week (:
GE:	yeah bro
GE:	glad youre excited haha
GE:	[heart symbol]

155. On or about May 31, 2019, CC-8—who began to purchase Medidata securities a few weeks earlier on the same day GE told CC-8 to “get ready”—engaged in the following message exchange with GE:

CC-8:	btw our other deal still on? You know how those things behave hor?
-------	--

GE: Yes of course

GE: Bro

GE: Next week

GE: Kaching

CC-8: Haha okay

GE: [winking face emoji]

156. On or about June 12, 2019, Dassault Systems announced that it was acquiring Medidata for approximately \$5.8 billion. CW-1 and CC-8 thereafter sold the Medidata securities they had purchased.

157. CC-10 participated in the scheme by collecting and laundering illicit trading proceeds for CC-1 and SAFI. Below is a February 2019 photograph of CC-1 (left), CC-10 (middle), and SAFI (right):



158. As set forth below, in or about March and April 2019, CC-10 and GE discussed GE kicking back \$40,000 in trading proceeds—which they referred to in code as 40 kilograms of “meat”—in a series of coded conversations in which they referred to laundering money as the “meat business.” For example, on or about March 8, 2019, GE and CC-10 engaged in the following coded exchange:

CC-10:

Hey bro. Our friend told me there is something to collect. Problem is I am not in Sg. And only person who can get it is my best buddy. But he is stuck at

my place cause he is a bit sick. You think it would be possible to hand it to him at my condo ?

GE: im not in Singapore

GE: haha

GE: and im with our friend in another city

GE: i don't think theres anything to collect

GE: ive arranged

CC-10: Ok cool

CC-10: Perfect

CC-10: :)

GE: thanks bro

CC-10: Say hi for me.

CC-10: He asked me a few days ago.. and i just found a way today lol

CC-10: Have fun

GE: haha thnanks!

159. Ten days later, on or about March 18, 2019, CC-10 and GE exchanged the following coded messages:

CC-10: Hey bro. Are you in sg ?

CC-10: Need to discuss something

CC-10: But better face to face.

GE: yo bro

GE: yeah

GE: im gonna be back only after 20th

GE: im still in nyc

CC-10: Okay. Basically might have some business opportunity.. but i have to fly 20th at night or 21st morning.

CC-10: Actually i think i might go 20th noon.

GE: ahhh would love to be able to catch you but i doubt i can

CC-10: What time are you back exactly ?

GE: can we talk when youre back?

GE: im gonna be flying on 20th nyc time

GE: so its gonna be quite impossible

GE: tbh

CC-10: Wow i see

CC-10: Yeap sounds complicated. Okay.. will try to find another solution then cause I might be away for sometimes after.

CC-10: I let you know

CC-10: Enjoy NYC

CC-10: !

GE: ok thanks bro

CC-10: Basically.. maybe you know. I am taking care of logistic for the meat business of our friends...

CC-10: And these days i need to focus more on the IT department.

CC-10: So I have to make the transition of this part of the business to you eventually.. and wanted to discuss with you the fees i usually take and if you think it would be good for you.



CC-10: I will talk to Eamma then and see how i can make this transition to you

GE: Yeah for sure

GE: I got it

GE: Thanks bro maybe I can even travel to where you are if it's important

CC-10: Yes. Can you talk to eamma.. he will explain you why SG :)

CC-10: Have fun

CC-10: Cheers

GE: got it

160. Between on or about March 22 and March 23, 2019, GE and CC-10 engaged in the following coded message exchange:

GE: Yo bro

GE: I'm back

GE: Let's meet today? Saw you're still around

CC-10: Hello. My myawaddy project has been postponed. I am in town until tuesday

CC-10: We catch up these days :)

CC-10: Welcome back

GE: All good

GE: Let's do it

161. On or about March 25, 2019, GE and CC-10 engaged in the following coded exchange:

GE: hey bro

GE: would you like to meet

GE: today

GE: in the afternoon

CC-10: Yes. We can do that. Around 4pm ?

GE: im not free at 4pm but either earlier or later is possible

GE: can we meet around paragon?

CC-10: Okay.

CC-10: A bit later then. What time is later for you ?

CC-10: :)

GE: maybe 5:30pm will be fine

CC-10: [thumbs up image]

GE: sounds great

GE: so lets confirm 5.30 at paragon yeah?

GE: we can have dinner together

CC-10: Yes. Our friend said you bring some meat right ?

GE: we will meet but i wasn't informed about any meat

CC-10: He said 40kg

CC-10: He asked me to collect today.. thats why i thought you know

GE: no ill ask him now

CC-10: Ok thanks

162. On or about March 27, 2019, GE and CC-10 continued to engage in a coded exchange about “meat”:

GE: Hey bro so I spoke to our friend and I realized there was a miscommunication

GE: Yeah I have the 40 kg meat for you but it might be a bit complicated to get it delivered this week as I might be going to Indo tomorrow

GE: Is it possible for me to pass you when we meet next in 10 days?

CC-10: Let me check buddy

CC-10: Hey bro

CC-10: Impossible to get them tmrw ?

CC-10: Cause they really needed it now

CC-10: I could drop by in the morning

GE: No it's not possible because I don't have them in my prrsonal fridge

CC-10: Okay i see

CC-10: When are you back from indo ?

GE: Yes I have to move around a bit but don't worry it has your name on it already arranged with my friend

GE: As soon as Sunday

GE: Do anytime next week is ok

CC-10: Okay I will tell my head butcher.

CC-10: To be on standby next week

GE: Ok

163. On or about April 2, 2019, GE and CC-10 continued their coded exchange, with GE inquiring whether the “meat” should be Singaporean or American:

CC-10: Hello bro

CC-10: When could you bring the meat to my friend.

CC-10: He could collect the 40 kg everyday  
after work

CC-10: 7pm onwards at his wharehouse

GE: I'll see what I can do

GE: Bro the meet should be us meat or sg meat

\*\*\*

CC-10: Ok. Actually can deposit the american meat.  
Directly on my personnal fridge.

CC-10: Gimme your number. I will give you the exact  
address of the warehouse

GE: I can deposit

CC-10: Cool

CC-10: [thumbs up image]

CC-10: Awesome Thats really helpfull cause it allows me  
to ship it fresh. Very fast

GE: Okay great

GE: I'll write you these days to arrange it

GE: I can't promise by tomorrow but by this week it's ok

GE: Hey bro please send me your account details so I  
can send you the funds for the meat

CC-10: Ok

GE: I'll send you via citybank

CC-10: Yep

GE: So if you're citybank account would be much easier

CC-10: I have dbs multicurrency sorry

GE: It's fine I'll just get it sent

GE: Will do it tomorrow ok

GE: Will go to my bank to get it done

CC-10: DBS  
Branch: Suntec City  
Bank Addr: 3E Temasek Blvd, 709-711, Singapore  
038984  
Account holder :[CC-10 name]  
(iban): [redacted]  
multi-currency account: [redacted]

GE: Got it

GE: And I can send USD there without any currency  
change right

CC-10: Yes

GE: Okay sounds good tomorrow will get it done

CC-10: Ok try to make it early if possible. Cause I will  
need to send the meat for an urgent catering ... in  
europe.

CC-10: Thanks a lot !

164. According to bank records, on or about April 4, 2019, GE wired \$40,000 to a DBS bank account in the name of CC-10.

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165. According to CW-1, SAFI tipped CW-1 ahead of Tiffany's October 28, 2019 announcement that LVMH had made an offer to acquire Tiffany.

166. Thereafter, on or about October 24, 2019 and October 25, 2019, CW-1 began purchasing Tiffany securities, including short-term call options, in his brokerage account, as well as in the accounts of Individuals 1 and 2.

167. On or about October 24, 2019, SAFI also began to purchase shares of Tiffany.

168. On or about October 24, 2019, CW-1 sent the following message to Individual 3: “URGENT. Buy Tiffany Co. symbol is TIF. Load the fuckin’ truck up.”

169. On or about October 28, 2019, after Tiffany publicly announced that it had received an unsolicited proposal from LVMH to acquire Tiffany for \$120 per share, Tiffany’s stock price closed at \$129.72 per share, an increase of more than 31 percent from the prior closing price.

170. According to CW-1, SAFI also tipped CW-1 ahead of the news that Stryker would acquire Wright Medical, prior to the November 2019 announcement of that transaction.

171. On or about November 1, 2019, SAFI began purchasing shares of Wright Medical, and on or about the same day, CW-1 purchased short-term call options in Wright Medical in multiple brokerage accounts.

172. After the stock market closed that same day, the Bloomberg news service reported that Wright Medical was exploring a possible sale of the company. Later that same day, CW-1 sent the following message to Individual 1: “I loaded you up today on Wright Medical. \$1m position. It is up another 10% now in after hours trading [5 sideways crying laughing emojis].” CW-1 added: “News out after market close that wright medical is exploring a sale. Lucky timing on my bet [winking emoji].”

173. On or about November 4, 2019, Stryker announced that it had entered into a definitive agreement to acquire Wright Medical, causing Wright Medical’s share price to increase nearly 32 percent over its prior closing price.

174. On or about the same day, CW-1 and GE exchanged the following messages:

GE: Yo bro

CW-1: yo yo yo, it's Christmas time (:

GE: Yeah bro

175. According to CW-1, SAFI also tipped CW-1 ahead of the news that Walgreens was considering a deal to take the company private, prior to Walgreens' November 2019 announcement of that fact.

176. On or about November 4, 2019, CW-1 purchased short-term Walgreens call options in multiple brokerage accounts. SAFI also purchased short-term Walgreens call options on or about the same day.

177. On or about the same day, November 4, 2019—which was the same day that the Wright Medical acquisition was announced—CW-1 and Individual 1 engaged in the following message conversation:

INDIVIDUAL 1: Holy shitballs!!!!!!!!!!

CW-1: What? You looking at your account?

INDIVIDUAL 1: Holy smokes

INDIVIDUAL 1: I'm cashing that baby out and fleeing the country

CW-1: Tomorrow you will hit \$4m

CW-1: Watch Walgreens

178. On or about November 5, 2019, after Bloomberg reported that Walgreens was reviewing a potential deal to take the company private, Walgreens' share price increased nearly 4 percent, and CW-1 began selling the Walgreens options that he had purchased.

**October 2019 – April 2020: Ingenico and CW-1's \$300,000 Payment**

179. According to CW-1, SAFI tipped CW-1 ahead of the news that Worldline—which had previously spun off from Atos—planned to acquire Ingenico, a France-based technology company. At the time, CC-2 was employed as Worldline's Deputy Head of mergers and acquisitions, and—according to documents produced by Worldline—had access to MNPI regarding the deal before it was announced.

180. On or about October 14, 2019, a brokerage account controlled by CW-1 began purchasing Ingenico call options.

181. On or about October 16, 2019, CC-8 began purchasing Ingenico call options.

182. On or about October 23, 2019, SAFI purchased Ingenico shares.

183. On or about October 30, 2019, CW-1 sent the following message to Individual 1: “and now you are loaded up on Ingenico stock in both TOD and IRA accounts, and I’m looking at a 30% upside target on that in the near future.”

184. On or about December 18, 2019, GE and CC-9 engaged in the following message exchange, in which GE solicited CC-9 to recruit additional traders to the insider trading conspiracy:

GE: yo bro ive a huge deal in january

GE: if your friend is ready to chat

GE: should do it sooner

GE: so we can get her on that one

\*\*\*

CC-9: I'll make it happen for you

GE: thanks bro

GE: \$\$\$\$



\*\*\*

GE: tell her minimum 1m

GE: cannot lose

185. On or about December 19, 2019, GE and CC-8 engaged in the following message exchange:

GE: You free to chat?

CC-8: Hey bro. Can text but not call yet

GE: Ok after work

GE: I'll message you on the other

Thereafter, CC-8 continued to acquire Ingenico call options.

186. On or about February 3, 2020, Worldline announced that it had agreed to acquire Ingenico at a price that implied a premium of approximately 16 percent to Ingenico's closing share price the previous day.

187. According to CW-1, in or about March 2020, GE and SAFI instructed CW-1 to wire \$300,000 in insider trading proceeds to a Hong Kong bank account held in the name of Individual 7, who I know to be the father of CC-3. Then, according to CW-1, GE provided CW-1 with Individual 7's bank account details.

188. When CW-1 expressed concern to GE that wiring \$300,000 to Hong Kong would look suspicious, GE told CW-1 to tell the bank that the money was a payment to an antique watch dealer that accepted only cash. According to CW-1, to substantiate the cover story, GE agreed to send a box purporting to be from Individual 7's address in Hong Kong to CW-1.

189. Accordingly, on or about April 1, 2020, a \$300,000 wire was sent from CW-1's Bank of America account to the account in the name of Individual 7. CW-1 listed the reason for the transfer as "personal goods".

190. Below are images of the wire transfer records from CW-1's bank and from Individual 7's bank:

04/01/20	WIRE TYPE:INTL OUT DATE:200401 TIME:1045 ET TRN:2020040100403105 SERVICE REF:961696	-300,000.00
BNF [REDACTED]	ID [REDACTED] 9959 BNF BK:CHINA CONST RUCTION BK(A ID [REDACTED] 0601	
PMT DET [REDACTED]	2614 Per sonal Goods POP Goods	

\*\*\*

[REDACTED] FLAT [REDACTED] [REDACTED] BUILDING [REDACTED] HK Hong Kong		
WE HAVE TODAY CREDITED YOUR ACCOUNT A/C NO. : [REDACTED] 9959 IN NAME OF : [REDACTED]		
BEING TELEGRAPHIC TRANSFER FROM BANK OF AMERICA, N.A., NEW YORK NEW YORK, NY UNITED STATES OF AMERICA		
VALUE 06 APR 2020 FOR	USD	299,982.00
NET AMOUNT CREDITED	USD	299,982.00
BY ORDER OF [REDACTED]		
DETAILS OF PAYMENT /RFB/[REDACTED] 2614//Personal Goods POP Goods		

191. Below is an image of the shipping label on the box that GE caused to be sent to CW-1, purportedly from Individual 7 in Hong Kong. The image was found pursuant to a Court-authorized search of GE's Apple iCloud account:

<b>*CUSTOMER DOC*</b> Do not attach to package!		<b>XEP</b>	<b>DHL</b>
<b>From :</b> [REDACTED] [REDACTED] HONG KONG HONG KONG		Sender Acc: CASHHKGWC Payer Acc : CASHHKGWC Origin : <b>HKG</b> Ph : [REDACTED] eMail:	
<b>To :</b> ATTN: [REDACTED] [REDACTED] LAS VEGAS, NV 89169		Ph : 0	
<b>89169 LAS VEGAS UNITED STATES OF AMERICA</b>			
<b>US - LAS - LAS</b>			
<b>C</b>	[REDACTED]	Day	Time
Shipment Ref :		Date : 2020/04/09	
Shipment Weight : <b>1.00 KG</b>		Pieces : <b>1</b>	

192. On or about July 15, 2020, CC-3 received a \$250,000 USD payment from Individual 7, the same individual CW-1 sent \$300,000 in illicit trading profits several months earlier, on or about April 1, 2020.

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193. As part of the scheme, GE and SAFI also attempted to recruit additional insiders from whom they could obtain MNPI. For example, according to CW-1, SAFI encouraged CW-1 to travel to New York and develop relationships with Wall Street bankers and other corporate insiders who had access to MNPI, from whom CW-1 could obtain MNPI for the scheme. Likewise, on or about October 26, 2019, GE engaged in the following message exchange with a friend, Individual 6, who worked as an actor in the New York area:

GE: did you think about the thing we talked about in nyc?

GE: [smiling tongue out emoji]

\*\*\*

GE: basically i told you i need to network with some people in nyc

GE: bankers and such and was wondering if you could introduce me

Individual 6: Ah yes

Individual 6: I've slept with enough

Individual 6: I can find them

\*\*\*

GE: im looking for investment bankers in big banks working in M&A specifically

Individual 6: Okay

Individual 6: I'll b\*\*w em to bring them in

GE: awesome lol

194. On or about August 18, 2019, GE wrote a message to himself about “short term goals,” which included “get sources in NYC” and “1M usd in trading account.”

**April 2020 – December 2020: Principia and Alexion**

195. GE also traded on the basis of MNPI from SAFI about the acquisition of Principia by the French pharmaceutical and healthcare company Sanofi S.A. In addition, GE passed the Principia MNPI to CC-3, who also traded on it.

196. On or about April 14, 2020<sup>14</sup>—two weeks after CW-1 sent \$300,000 in illicit trading proceeds to an account in the name of CC-3’s father—GE and CC-3 engaged in the following Telegram exchange:<sup>15</sup>

GE:	Partner is recommending you to deleverage
CC-3:	But any colors
CC-3:	Is the next deal being delayed
GE:	Yes
GE:	And no
GE:	May 4 <sup>th</sup> deal so far on track
GE:	But Sanofi is delayed 2 weeks

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<sup>14</sup> For each image recovered from Court-authorized searches of iCloud accounts and referenced in this affidavit, I reviewed the metadata associated with the image, which I believe provides an approximate date for when an image was taken.

<sup>15</sup> The messages appear in a screenshot of the exchange that was obtained through a Court-authorized search of CC-3’s Apple iCloud account. The messages attributed to CC-3 appear on the right side of the exchange, which based on my training and experience, is consistent with the sender being the owner of the account—in this case, CC-3. The messages attributed to GE appear on the left side of the exchange, attributed to a user named “Josh Sgp New.” Based on materials obtained from a Court-authorized search of a Google account associated with CC-3, the “Josh Sgp New” contact is associated with a phone number I know to belong to GE.

CC-3: So the may deal is not the sanofi deal??

GE: No

GE: My mistake

GE: They both pharma

GE: 20bn deal is also medical devices

GE: Sanofi is 100-200% upside btn

GE: 5 bil deal

197. On or about June 9, 2020, according to materials obtained from FINRA, Sanofi submitted a written offer to acquire Principia, although that fact was not publicly announced at the time.

198. On or about July 9, 2020, GE and CC-3 began purchasing shares of Principia, and sold their shares on July 15, 2020.

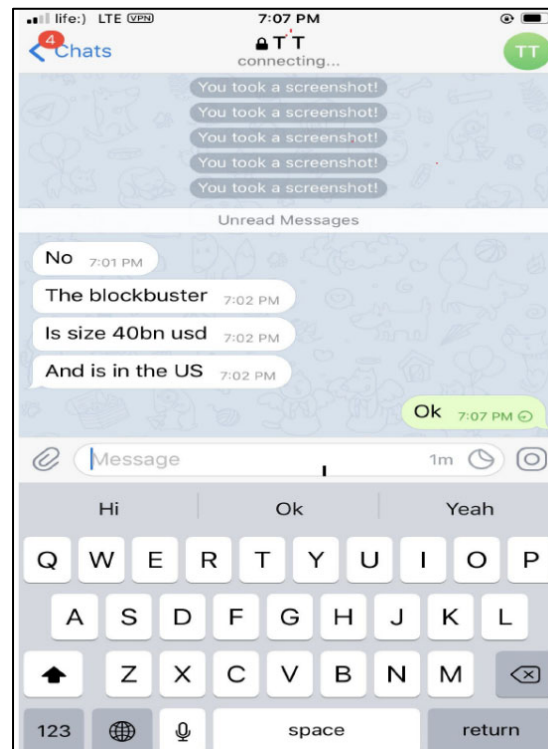
199. On or about the following day, July 16, 2020, Bloomberg reported that Sanofi was studying potential acquisitions of U.S. biotechnology, including Principia. On or about August 17, 2020, Sanofi announced that it had entered into a definitive agreement with Principia whereby Sanofi would acquire all outstanding shares of Principia for \$100 per share, representing a transaction value of approximately \$3.68 billion. Based on the summarized deal timeline and the Telegram exchange (reproduced above), I believe that GE's reference to a forthcoming "5 bil" "Sanofi" deal was the MNPI that Sanofi was pursuing an acquisition of Principia.

200. GE also traded on the basis of MNPI from SAFI about AstraZeneca's December 2020 acquisition of Alexion, and tipped CC-3 about the deal.<sup>16</sup>

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<sup>16</sup> According to CW-1, he also previously obtained MNPI from SAFI regarding Alexion.

201. On or about August 21, 2020, GE and SAFI engaged in the following Telegram exchange (with GE's messages appearing on the right and SAFI's messages appearing on the left), in which SAFI describes to GE a "blockbuster" "US"-based deal valued at \$40 billion ("40bn usd"):<sup>17</sup>



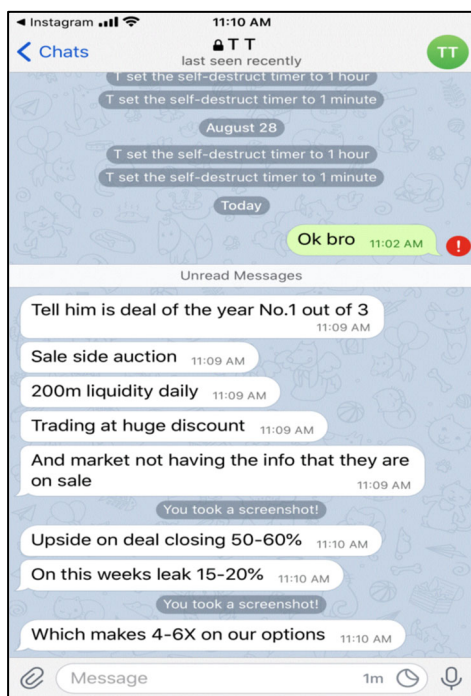
202. Records obtained from the SEC indicate that GE traded in Alexion securities approximately one week after this message, on or about August 28, 2020. SAFI had already traded in Alexion securities prior to the above message to GE, on August 18, 2020.

203. On or about August 31, 2020, SAFI and GE engaged in the following Telegram exchange, with SAFI instructing GE to tell CC-3 ("him") that the deal was "deal of the year,"

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<sup>17</sup> Screenshots of GE's Telegram messages with SAFI were obtained via a Court-authorized search of GE's Apple iCloud account. The investigation to date links the username "TT" to SAFI. According to CW-1, SAFI used Telegram, and Telegram's feature of disappearing or self-deleting messages, to communicate MNPI.

involved a “Sale side auction,” and that Alexion’s share price was “Trading at huge discount | And market not having the info that they are on sale.” SAFI further advised that the investment upside on “our options” was “4-6x,” with an “upside” of “15-20%” on “this weeks leak” and “50-60%” on the “deal closing.” CW-1 has advised that leaking information to journalists was a technique that SAFI used to impact share prices. Specifically, CW-1 advised that on occasion, instead of waiting for merger and acquisition transactions to be announced, SAFI would facilitate the publishing of information regarding acquisitions and then trade on the market’s reaction to those news stories.



204. On or about the same day, GE and CC-3 engaged in the following Telegram exchange<sup>18</sup>, with CC-3 asking if the target price for the stock was \$145, and telling GE that he had

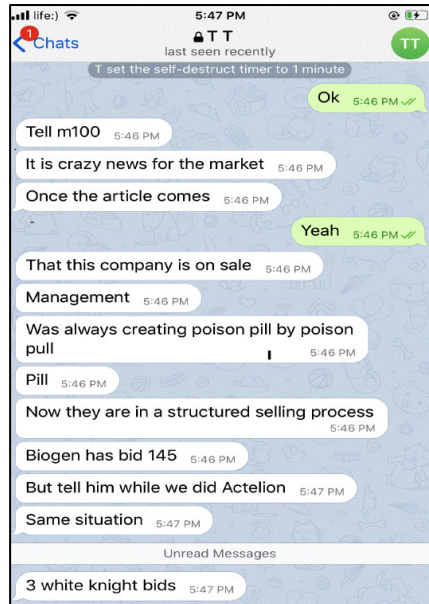
<sup>18</sup> According to GE’s contacts obtained from a Court-authorized search of his Apple iCloud account, the phone number attributed to “[CC-3’s first name] Investor” is the same phone number associated with a brokerage account that CC-3 opened in CC-3’s own name in or about February 2020.



purchased approximately 65,000 shares at \$113.55 per share, which substantially matched CC-3's trading in Alexion on or about August 31, 2020.



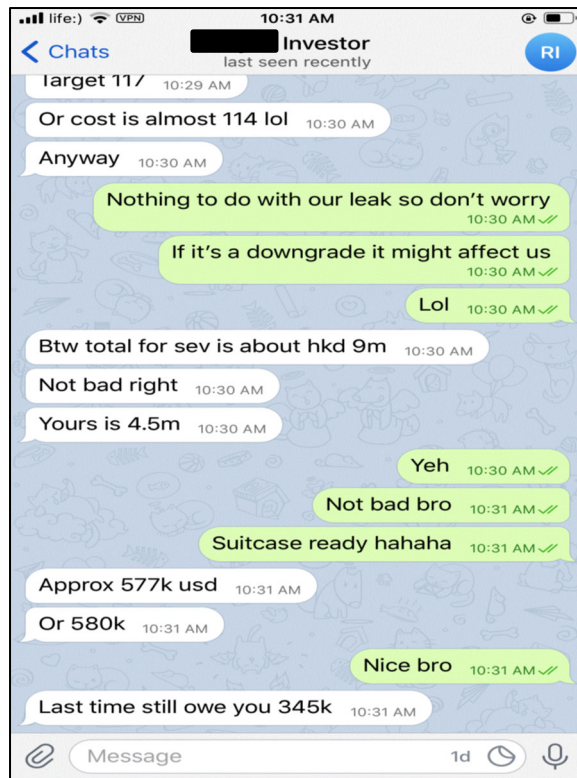
205. On or about the same day, August 31, 2020, SAFI continued to provide MNPI to GE, so that GE could forward the information to CC-3. In the following exchange, for example, SAFI told GE that “Biogen has bid 145”—the same target price referenced in the above exchange—and instructed GE to tell CC-3 that “It is crazy news for the market | Once the article comes | That this company is on sale... Now they are in a structured selling process.” Additionally, SAFI set the Telegram messages to self-destruct, a feature of messaging that CW-1 told investigators that CW-1, SAFI, and GE regularly used.



206. On or about the same day, GE and CC-3 discussed the August 2020 price movement of Alexion—“opened at 108” and “through 114”—and CC-3 asked GE “Are you certain that the news is coming out? But won’t get canned like prnb last time?” As discussed above GE and CC-3 purchased shares of Principia—which traded under the ticker “PRNB”—in or about July 2020, approximately five weeks before the announcement that Sanofi had agreed to acquire Principia, based on MNPI about the deal from SAFI.



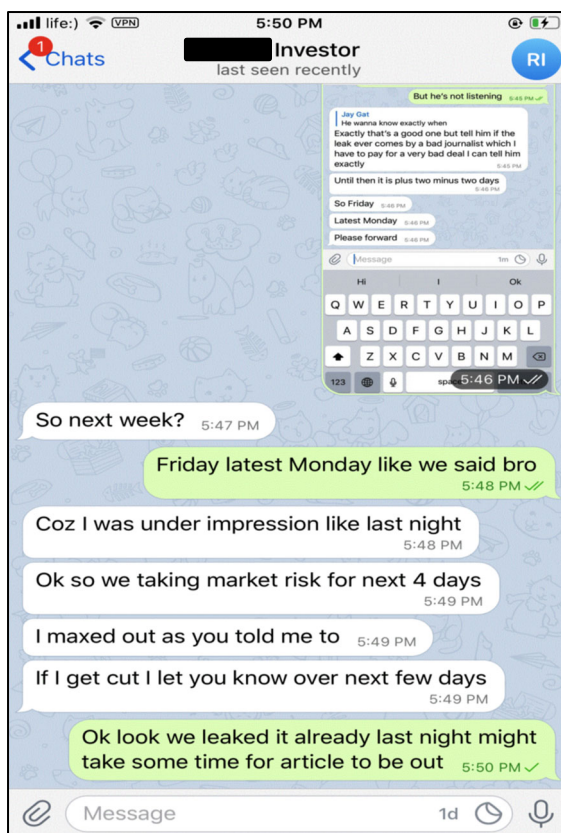
207. On or about September 1, 2020, GE and CC-3 continued to discuss the Alexion MNPI. GE referred to “our leak”—a news story that the conspirators anticipated would affect Alexion’s stock price—and CC-3 discussed splitting trading proceeds from “sev”. I know “SEV” to be the ticker symbol for Suez S.A. (“Suez”), and trading records reflect that both GE and CC-3 began purchasing shares of Suez on or about August 21, 2020, nine days before the August 30, 2020 announcement that Veolia had offered to acquire 29.9 percent of Suez from Engie. Based on the context, including CC-3’s messages that “total for sev is about hkd 9m... Yours is 4.5m... Approx 577k usd” and GE’s response that “Suitcase ready hahaha,” I believe GE and CC-3 were discussing the split of illicit trading proceeds on Suez.



208. On or about September 1, 2020, CC-3 continued to pressure GE to know “exactly when” the leak regarding the Alexion deal would occur. GE messaged SAFI: “He wanna know exactly when” and “he’s not listening,” to which SAFI responded that the leak would occur “plus two minus two days | So Friday | Latest Monday | Please forward.”



209. After GE forwarded SAFI's message about leaking the MNPI, CC-3 responded: "Coz I was under impression like last night | Ok so we taking market risk for next 4 days | I maxed out as you told me to | If I get cut I let you know over next few days." GE responded: "Ok look we leaked it already last night might take some time for article to be out."



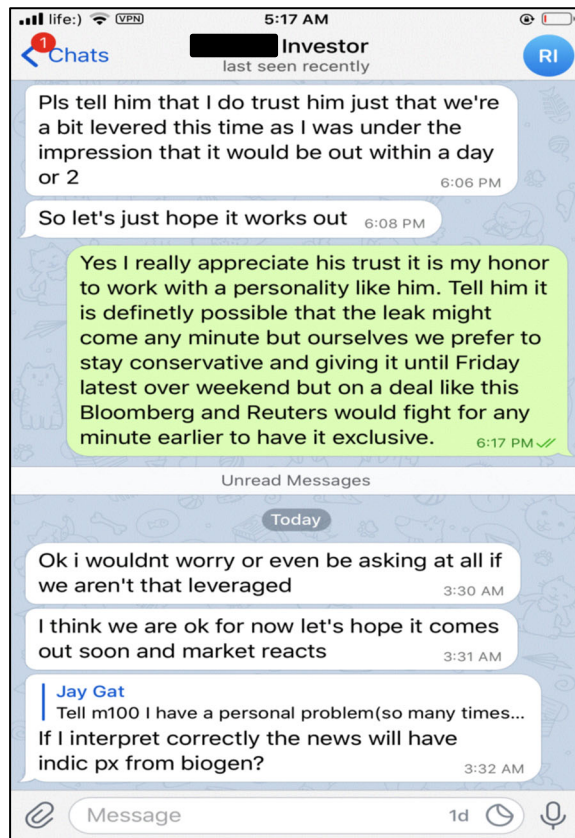
210. Approximately two minutes later, in messages that SAFI set to self-destruct after one minute, SAFI provided more detail about the MNPI to GE to forward to CC-3: “Bro tell him this one is a quality deal | The background of this deal | Since years... Many investors lost their faith | This may Elliott wrote an open letter<sup>19</sup> | You can read it | It is already | Despite the Biogen vid | Bid | Crazy news that the are on sale | We will see multiple rival bids | please forward.”

211. On or about the same day, GE and CC-3 exchanged the following Telegram messages about the deal, in which CC-3 said he was “under the impression that [the news leak] would be out within a day or 2,” and GE responded: “Tell him it is definitely possible that the leak might come any minute but ourselves we prefer to stay conservative.” CC-3 added that he was

<sup>19</sup> On or about May 12, 2020, Elliott Advisors Ltd. sent an open letter to Alexion’s board of directors “to draw the Board’s attention to the intense and growing dissatisfaction of shareholders with the Company’s current course.”



“leveraged” on his investment in Alexion, and that he “hope[d] it comes out soon and market reacts.” CC-3 also asked whether the leak would include the price of the bid from Biogen.



212. Approximately two weeks later, on or about September 15, 2020, the industry periodical *Seeking Alpha* published an article suggesting that Biogen might be looking to acquire Alexion.

213. On or about December 12, 2020, AstraZeneca and Alexion announced a definitive agreement for AstraZeneca to acquire Alexion for approximately \$39 billion, or approximately \$175 per share, a 45 percent premium to Alexion’s closing price the prior day.

## CONCLUSION

214. Based on the information described above, there is probable cause to believe that GE and SAFI have committed : (i) conspiracy to commit securities fraud, in violation of Title 18, United States Code, Sections 371 and 1349; (ii) securities fraud, in violation of Title 15, United

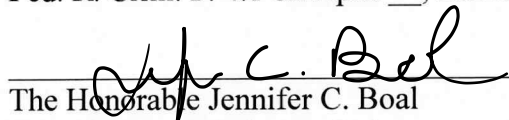
States Code, Sections 78j(b) and 78ff(a), Title 17, Code of Federal Regulations, Section 240.10b-5, and Title 18, United States Code, Sections 1348 and 2; (iii) conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h); and (iv) money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), (a)(2)(B)(i), and 2.

Respectfully submitted,



Thomas Corbolotti, Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to me telephonically in accordance with  
Fed. R. Crim. P. 4.1 on April 22, 2024.

  
The Honorable Jennifer C. Boal  
United States Magistrate Judge  
United States District Court for the District of Massachusetts